

**DOE, et al.**

**vs.**

**METROPOLITAN GOV'T OF NASHVILLE, et al.**

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**DR. SHARON GRIFFIN**

**May 20, 2022**



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IN THE UNITED STATES DISTRICT COURT FOR TENNESSEE  
FOR THE MIDDLE DISTRICT  
NASHVILLE DIVISION

JANE DOE,

Plaintiff,

Vs.

Case No. 3:20-cv-01023

THE METROPOLITAN GOVERNMENT  
OF NASHVILLE AND DAVIDSON COUNTY,  
TENNESSEE AND DR. ADRIENNE BATTLE,  
Defendants.

DR. LILY MORENO LEFFLER,  
Plaintiff,

Vs.

THE METROPOLITAN GOVERNMENT  
OF NASHVILLE AND DAVIDSON COUNTY,  
TENNESSEE AND DR. ADRIENNE BATTLE,  
Defendants.

DR. JAMES BAILEY,  
DR. PIPPA MERIWETHER,  
AND DR. DAMON CATHEY,  
Plaintiffs,

Vs.

THE METROPOLITAN GOVERNMENT  
OF NASHVILLE AND DAVIDSON COUNTY,  
TENNESSEE AND DR. ADRIENNE BATTLE,  
Defendants.

THE DEPOSITION OF DR. SHARON W. GRIFFIN  
May 20, 2022

APPEARANCES (All Via Zoom)

For the Plaintiffs, Dr. James Bailey,  
Dr. Lily Leffler, Dr. Pippa Meriwether,  
and Jane Doe:

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Also Present:

DR. JAMES BAILEY  
DR. DAMON CATHEY  
DR. PIPPA MERIWETHER  
MS. JANE DOE

The deposition of DR. SHARON W. GRIFFIN, taken  
via Zoom on behalf of the Plaintiffs, pursuant to  
Notice on May 20, 2022, beginning at approximately  
9:13 a.m. with the witness appearing at 1661  
International Drive, Suite 400, Memphis, Tennessee.

This deposition is taken in accordance with the  
terms and provisions of the Federal Rules of Civil  
Procedure.

The signature of the witness is waived.

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1 PROCEEDINGS

2

3 THE REPORTER: Good morning. My name is

4 Anne Perry. I am a Tennessee licensed reporter

5 working with Elite Reporting. My LCR number is 283.

6 Today's date is May 20, 2022, and the time is

7 approximately 9:13 a.m. Central.

8 This is the deposition of Dr. Sharon Griffin in

9 the matter of Jane Doe vs. The Metropolitan Government

10 of Nashville and Davidson County, Tennessee and Dr.

11 Adrienne Battle; Dr. Lily Moreno Leffler vs. the same

12 defendants; Dr. James Bailey, Dr. Pippa Meriwether and

13 Dr. Damon Cathey vs. the same defendants. The case

14 number is 3:20-cv-01023.

15 This deposition is being taken by

16 videoconference, and the oath will be administered by

17 me. Any digital exhibits marked during this

18 deposition will be deemed as "original" for purposes

19 of said deposition, with the actual original document

20 retained by counsel introducing the exhibit for

21 purposes possibly needed for in-court hearing.

22 At this time, I'll ask counsel to identify

23 yourselves and state whom you represent. If you have

24 any objections with the procedures I've outlined,

25 please state so when you introduce yourself.

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1 And we can start with the noticing attorney.

2 MS. STEINER: Dr. Griffin -- or for the

3 record, my name is Ann Steiner, and I represent Jenai

4 Hayes, who is going under Jane Doe, Dr. James Bailey,

5 Dr. Pippa Meriwether, and Dr. Lily Leffler in this

6 cause of action.

7 MS. HARBISON: My name is Jesse Harbison,

8 and I represent plaintiff Dr. Damon Cathey.

9 MS. WOODWARD: My name is Kelly Woodward,

10 and I represent the Metropolitan Government.

11 (Witness sworn.)

12 MS. STEINER: Just for the record, Kelly,

13 you also represent Dr. Adrienne Battle. Correct?

14 MS. WOODWARD: Yes, that's correct.

15 DR. SHARON W. GRIFFIN,

16 having been first duly sworn, was examined and

17 testified as follows:

18 EXAMINATION

19 BY MS. STEINER:

20 Q. Okay. Dr. Griffin, good morning.

21 A. Good morning.

22 Q. My name is Ann Steiner, and I represent four of

23 the plaintiffs in this lawsuit against Metropolitan

24 Government of Nashville and Davidson County, and my

25 clients assert that they were retaliated against

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1 because they had engaged in various protected

2 activities, and they were either demoted or lost their

3 jobs at Metro.

4 And I am going to ask you a whole bunch of

5 questions today, and if you can't hear me at any point

6 in time, let me know. Okay? If I ask a question that

7 is confusing, which is something that I am apt to do,

8 stop and say, Could you please rephrase that.

9 A. Uh-huh.

10 Q. Also, if you would like to go back at any point

11 in time and change a response, you think of something

12 that maybe you should have said or said it wrong,

13 please let us know, and you are more than welcome to

14 do that, because this is -- this is our chance to

15 question you about this case. Okay? Is that okay?

16 A. Uh-huh. Yes, that's okay.

17 Q. Now, the only thing I'm going to really stop you

18 is if I ask you a question and rather than saying yes

19 or no you do uh-huh.

20 A. Got you.

21 Q. Uh-huh.

22 A. Got you.

23 Q. Because I understand what you're saying, but

24 when we go to try this case on December 6th of 2022,

25 we will not be able to decipher what was said because

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1 we're not videotaping this. Okay?

2 A. Yes.

3 Q. Okay. Now, Dr. Griffin, what is your home

4 address?

5 A. My home address is [REDACTED],

6 [REDACTED], Memphis, Tennessee 38128.

7 Q. Do you have any plans of moving in the near

8 future?

9 A. Absolutely not, no.

10 Q. Okay. So we're going to -- and are you

11 currently employed?

12 A. I am actually retired. I retired officially

13 with 30.7 years in public education from the State of

14 Tennessee. So I retired officially on January 7th,

15 2022.

16 Q. Congratulations.

17 A. Thank you.

18 Q. And even though you retired, are you doing any

19 contract labor for any organizations or any groups?

20 A. I am not. I am a licensed real estate agent --

21 Q. Oh, wow.

22 A. -- affiliate broker for the State of Tennessee.

23 So I haven't -- I do have some other means to do that,

24 and I am also an adjunct professor at the University

25 of Memphis. I have been there since 2014.

1 I currently normally teach since we have been in  
2 this COVID space just one hybrid class a semester, but  
3 this summer, just due to some other things happening,  
4 I will be able to teach two classes for the University  
5 of Memphis, and I have been there as an adjunct since  
6 2014.

7 Q. And what department are you in?

8 A. The department of leadership. I work with  
9 doctoral students as well as students receiving a  
10 master's degree in educational leadership, whether it  
11 be a teacher, a principal wanting to get a doctorate,  
12 or someone who just wants to get certified.

13 Q. Okay, good. And what are the two classes that  
14 you are teaching?

15 A. I am teaching this summer school Business  
16 Management, which is a class that deals with managing  
17 school resources in the school setting, and I'm also  
18 teaching Field Experience for those teachers or even  
19 assistant principals who need to really experience  
20 during a summer school setting what it's like to work  
21 in a school. They will have what's called field  
22 experience, and I'll be their supervising lead  
23 professor for that.

24 Q. Okay. And are these -- do you teach both of  
25 those classes on location at Memphis State?

1 A. Well, they are hybrid right now due to COVID,  
2 and so we are not even sure yet if in person will be  
3 allowed, but with the numbers going up here in our  
4 city -- don't know what it's like in Nashville or  
5 where you are, but the numbers are going up. So we're  
6 not sure how we're going to be able to -- may have to  
7 do some things similar to what we're doing here, but  
8 we have been in a hybrid state, some students going on  
9 campus one or two days a week.

10 These are graduate students. So we have done a  
11 lot of Zoom. We use Canvas for the platform at the  
12 University. We have a meeting -- school is not  
13 expected to start until -- May 31st is the first day.  
14 So we will finalize that on -- early next week on  
15 exactly what it will look like.

16 Q. Okay. And do you also plan on teaching in the  
17 fall semester?

18 A. Well, I just don't know. Again, I have only  
19 been retired -- this is something I did anyway as a  
20 full-time employee. So I haven't taken on any new  
21 responsibilities. Again, I'm an affiliate broker for  
22 the State. So I just don't know. I'm, you know,  
23 going to just see what plays out. To be really honest  
24 and transparent here, I don't know, you know. So I'm  
25 doing what I would have done anyway had I still been

1 employed.

2 Q. Okay. And who is your supervisor at Memphis  
3 State?

4 A. The University of Memphis, my supervisor is  
5 Ronald, R-O-N-A-L-D, Platt, P-L-A-T-T, Dr. Ronald  
6 Platt.

7 Q. And what -- the department that you teach in,  
8 what building is it located in?

9 A. It is in Ball, B-A-L-L, Hall. It's been so long  
10 since we have been on campus. Ball Hall.

11 Q. Okay. The real estate company that you work  
12 for, which one is that?

13 A. It is Harris, H-A-R-R-I-S, Harris Realty,  
14 R-E-A-L-T-Y, Company.

15 Q. And what location are you at?

16 A. They have a location here in Memphis, and I can  
17 give you that address. I have my business card.

18 Q. Can you? Okay.

19 A. I've got a business card. I don't know if you  
20 can see it. I've got a business card here, and I'll  
21 give you the address.

22 Q. Thank you.

23 A. The address is 8820 Trinity, T-R-I-N-I-T-Y,  
24 Road, Suite 101, Cordova, Tennessee, which is still  
25 Memphis, but it's like a little suburb, 38018.

1 Q. Thank you. And what's the number on that?  
2 What's your phone number or the contact number?

3 A. The office number is (901)372-8003.

4 Q. Okay. Good. Thank you so much. And good luck  
5 with that.

6 A. Oh, it's been a great -- it's a good little part  
7 time, you know.

8 Q. That's fun.

9 Okay. Now, let me ask you a question about  
10 this. Did you -- when we asked to take your  
11 deposition before, Metro told us that you were too ill  
12 for a deposition.

13 A. Well, in the fall -- so I actually was on FMLA  
14 in October of 2021. I had been having some cardiology  
15 issues going on -- I have a cardiologist, and I have  
16 been having some issues there, and I needed to have  
17 some surgery. I could not do that because, of course,  
18 with the anesthesiologist, you have to get a  
19 clearance, and so part of me being able to get the  
20 clearance was being monitored. I wore actually a  
21 heart monitor, and I needed to be monitored very  
22 closely.

23 I needed to -- couldn't put the surgery off too  
24 much longer, but it was in enough time that I, you  
25 know, could take FMLA. Did not actually have the

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1 surgery until November because it took that long to  
 2 get my body regulated to actually be put to sleep.  
 3 So, yes, I was out, and I think I went out  
 4 October 6th or 7th. So I mean -- and it's all  
 5 documented. So you can pull that --  
 6 Q. That's fine, that's fine --  
 7 A. That's October 6th or 7th.  
 8 Q. You don't really need to tell me about your  
 9 condition. I was just curious. By January/February,  
 10 though, had you recuperated?  
 11 A. I am still recuperating, and I can say to you  
 12 that part of my decision to retire early was because I  
 13 needed to focus on my health.  
 14 Q. Okay.  
 15 A. I started very early. As you can see, I am not  
 16 that old with 30.7 years. So I started very early as  
 17 an educator.  
 18 Q. Sure.  
 19 A. And most of my work has been in turnaround, and  
 20 really that work is difficult lifting schools out of  
 21 priority status, you know, and just the strenuous  
 22 commitment physically and mentally that's required for  
 23 that work. I knew it was going to be, you know, a lot  
 24 on my health.  
 25 And so because I am the person that I am and I

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1 had the time where I could retire and advice from my  
 2 physicians as well, all of them, was that I needed to  
 3 take a rest.  
 4 And so I had the time, and so part of my  
 5 decision to retire in January was health driven. So I  
 6 was experiencing and I am still experiencing some  
 7 health challenges.  
 8 Q. Okay. But it looks like you are doing pretty  
 9 good right now. Is that fair to say?  
 10 A. Oh, yeah, I mean, you know, I'm not going to  
 11 complain. I'm above ground. So I always look at that  
 12 in a positive way, in a positive light. You know, I'm  
 13 still able to do the work that I was doing with the  
 14 University, but, again, the commitment that's required  
 15 for the day-to-day work that's needed in the  
 16 turnaround space of which I was responsible is -- I  
 17 want to give it 110 percent, and so that requires a  
 18 lot of physical work.  
 19 When I say "physical," even though we were in  
 20 the virtual space at the time that I was there for the  
 21 COVID time, you still needed to be on the ground doing  
 22 a lot of physical work. So --  
 23 Q. Okay.  
 24 A. -- with that in mind, that kind of pushed my  
 25 decision toward retirement.

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1 Q. Okay. Now, Dr. Griffin, I looked you up online,  
 2 and it looks like you've got your teaching degree.  
 3 A. I do.  
 4 Q. And you've got a master's, and then you've got a  
 5 Ph.D. Is that correct?  
 6 A. I've got an Ed.D instead of a Ph.D. I was three  
 7 courses shy of a Ph.D., and I said, I'm not going back  
 8 to class. I am through. So, yes, I have an Ed.D. So  
 9 my undergrad degree, I was certified in biology. My  
 10 undergrad degree, I thought I wanted to be a neonatal  
 11 nurse. So I got all of these sciences. But then I  
 12 did work/study at a Boys & Girls Club, and I just  
 13 absolutely could not leave the kids. So I got  
 14 certified to teach, and that's how I got into  
 15 education.  
 16 So my -- I got certified in biology. I taught  
 17 physics. I taught chemistry. And then, of course, I  
 18 got certified to be a principal. And I was a  
 19 principal -- assistant principal for five years, a  
 20 principal for five years, and then, of course, I've  
 21 been at the district level now for 22 years.  
 22 Q. Okay. Great. Now, where did you get your  
 23 biology degree?  
 24 A. LeMoyne-Owen. It's our only HBCU here in the  
 25 City of Memphis. It's called LeMoyne-Owen College

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1 located at 807 Walker Avenue.  
 2 Q. Where did you get your master's?  
 3 A. University of Memphis, master's and doctorate.  
 4 Q. And where did you almost get the Ed.D?  
 5 A. I got an Ed.D. Ed.D. is a doctorate. Ph.D. is  
 6 a couple more classes of research. They are  
 7 equivalent, except Ph.D. you did more research.  
 8 Q. Okay. Where did you get your doctorate?  
 9 A. University of Memphis.  
 10 Q. Okay. And where did you -- is that where you  
 11 almost got your Ph.D., too?  
 12 A. Well, yeah. So Ph.D. and Ed.D. are equivalent.  
 13 Yeah, I could have taken three more classes, yes.  
 14 Ed.D. is what I hold. I also have a superintendent  
 15 endorsement that I received in 2009.  
 16 Q. Wonderful.  
 17 Now, remember, I don't know a whole lot about  
 18 education.  
 19 A. Okay.  
 20 Q. And so if I ask you a question that seems a  
 21 little bit off, just blame it on lack of knowledge on  
 22 my part. Okay?  
 23 A. Okay. Okay.  
 24 Q. Now, have you ever given a deposition before?  
 25 A. I have.



1 Q. How many times?  
 2 **A. Ooh, I mean, being at the district level, with**  
 3 **my previous, I was with Shelby County Schools. It was**  
 4 **Memphis City Schools merged into Shelby County Schools**  
 5 **in 2013, and being at the district level for so long,**  
 6 **ooh, I would say -- you want a number?**  
 7 Q. Yeah, just approximate.  
 8 **A. Four, five, maybe more, definitely four or five**  
 9 **times.**  
 10 Q. Did you ever testify in any depositions  
 11 concerning Metropolitan Nashville Public Schools?  
 12 **A. No, I did not, have not.**  
 13 Q. Did you ever testify in any lawsuit concerning  
 14 Metro Nashville Public Schools?  
 15 **A. No, I did not.**  
 16 Q. Okay. Now, of the four or five times -- did you  
 17 ever testify in court at all?  
 18 **A. No, it was always in a setting very similar to**  
 19 **this.**  
 20 Q. Did any of those four or five times you  
 21 testified concern any sort of discrimination or  
 22 retaliation case?  
 23 **A. No.**  
 24 Q. Okay. Did you know -- are you familiar at all  
 25 with Title VII? Do you know what that is?

1 **A. You'll have to draw my -- I don't know. I'm**  
 2 **going to say no because I've been away from the**  
 3 **work --**  
 4 Q. Are you familiar with the discrimination laws  
 5 that says that -- the federal laws and state laws that  
 6 say you can't discriminate based on race, sex, age,  
 7 national origin, et cetera?  
 8 **A. Yes.**  
 9 Q. And when you went to work for Metro Schools, did  
 10 they train you at all in those areas? Do you recall?  
 11 **A. I want to say human resources when I started,**  
 12 **because there was a different human resources director**  
 13 **that I started with versus the one when I left.**  
 14 **I don't know if I had specific -- well, we had**  
 15 **so much online training, I want to say yes. I want to**  
 16 **say yes. I think that was one of the modules for**  
 17 **online training definitely.**  
 18 Q. But do you recall how much of the online  
 19 training dealt with discrimination?  
 20 **A. I do not recall how much of it dealt with**  
 21 **discrimination.**  
 22 Q. Were you ever trained that someone who refuses  
 23 to engage in -- or who reports an illegal activity  
 24 cannot be retaliated against?  
 25 **A. I would like to say yes, that was part of the**

1 **training, yes.**  
 2 Q. Okay. Now, when did you start with Metro  
 3 Schools?  
 4 **A. I started with Metro Schools July of 2019. The**  
 5 **1st of July, July 1.**  
 6 Q. Of 2019?  
 7 **A. Uh-huh, 2019, uh-huh.**  
 8 Q. And when did you leave?  
 9 **A. January 7th of 2022.**  
 10 Q. Okay. Was there any particular reason why you  
 11 left on January 7th as opposed to something like  
 12 January 2nd or 3rd?  
 13 **A. There was no particular reason why I left on**  
 14 **January 7th, but looking at the calendar -- of course,**  
 15 **you know, you have consultations from TCRS, which is**  
 16 **the Tennessee Consolidated Retirement System. I was**  
 17 **trying to make sure that, you know, it was in a time**  
 18 **frame that lined up with where my paperwork -- it**  
 19 **wouldn't be a gap in my paperwork and all of that,**  
 20 **and, of course, again, it just wasn't a specific date.**  
 21 **I was really getting advice from my physicians, and so**  
 22 **with that being said, you know ...**  
 23 Q. Did anyone at Metro Schools, though, tell you  
 24 that you were better off retiring on January 7th as  
 25 opposed to --

1 **A. No.**  
 2 Q. -- like January 3rd or 2nd?  
 3 **A. Oh, no, no, nobody at Metro, no, told me that,**  
 4 **no.**  
 5 Q. Okay. Now, when you started to work in July of  
 6 2019, who was in charge of human resources?  
 7 **A. It was -- what was his name?**  
 8 Q. Was it Tony Majors?  
 9 **A. Yes, Tony Majors. Dr. Tony Majors was**  
 10 **responsible for human resources when I was hired.**  
 11 Q. And then did it become Dr. Chris Barnes?  
 12 **A. Yes, Chris Barnes, that's correct, Chris Barnes.**  
 13 Q. And when you retired, who was HR? Do you  
 14 recall?  
 15 **A. Well, I left in October. Again, I was on**  
 16 **approved FMLA. Chris Barnes had just left the**  
 17 **district probably a couple of weeks or maybe a month**  
 18 **before I was FMLA, and interim -- for my**  
 19 **understanding, the interim/named HR person was our**  
 20 **former legal counsel, which was Melissa Roberge -- is**  
 21 **it Roberge?**  
 22 Q. Yes, it is.  
 23 **A. Melissa Roberge.**  
 24 Q. Okay. Now, did anyone at all tell you that if  
 25 you retire on January 7th, because that is the first

1 day back, that you will receive pay, a credit on the  
2 TCRS up through January 7th?

3 **A. No.**

4 Q. And that if you left before that date, you would  
5 not?

6 **A. No. My goal was I was hoping that my health**  
7 **would get better, because even if you look at any of**  
8 **my past histories of when I left Metro -- when I left**  
9 **Shelby County Schools in 2018 to be with the State**  
10 **from 2018 to 2019 and the commissioner hired me, I**  
11 **always leave on June 30th. And so in no way, shape,**  
12 **form, or fashion was the 7th just a target date of any**  
13 **kind for any reason.**

14 I would have hoped and liked for it to have been  
15 at a time, you know, when transitions normally occur.  
16 In my history, I've never left the district before the  
17 end of a fiscal year just simply because, you know, I  
18 want to make sure that everything is in place.

19 So me leaving January 7th had nothing to do with  
20 anything except advice from my own physician as well  
21 as dialogue with my own family.

22 Q. Let me ask you a question, and you may not know  
23 this, okay, but if you had a worker who was going to  
24 leave the system, and they said, I'm going to leave  
25 the system, and it's going to be something like

1 January 2nd, and you knew that if they leave on the  
2 2nd they weren't going to get credit for the full  
3 semester but if they left on the 4th or the 5th, they  
4 would, would you tell them that?

5 **A. Absolutely not. In no way should we ever in**  
6 **supervisor roles or even colleagues influence a person**  
7 **to do anything that's not, you know, to benefit or**  
8 **deny the system of what he or she has already made her**  
9 **decision around. Absolutely not.**

10 Q. Okay. Now, what was your position at Metro?

11 **A. I was chief of innovation. I was actually the**  
12 **first chief of innovation that Metro Nashville schools**  
13 **had.**

14 Q. Have you spoken with anyone about your subpoena  
15 to come here for a deposition?

16 **A. Absolutely not, no.**

17 Q. Have you spoken with anyone about this lawsuit?

18 **A. I have not. Had no idea of anything about the**  
19 **lawsuit.**

20 Q. Okay. When was the last time that you spoke  
21 with Dr. Battle?

22 **A. Oh, I haven't spoke to Dr. Battle -- I left**  
23 **in -- I spoke to Dr. Battle in December and shared**  
24 **with her my prognosis of my medical condition, and**  
25 **then when I finally made the decision to retire in**

1 **December, I haven't spoken with her since.**

2 Q. Okay. Now, chief of innovation, what did you  
3 do?

4 **A. Oh, the chief of innovation was a role that was**  
5 **responsible for supporting the high-priority or**  
6 **high-need schools. Priority schools were the schools**  
7 **that had fallen into the bottom 5 percent of schools**  
8 **across the state.**

9 It's a designation that the State assigns based  
10 on where your test scores fall, and so I was  
11 responsible for all of the priority schools of  
12 elementary, middle and high schools.

13 At that time, it was 23. When I left, two  
14 schools had closed. So it was down to 21, and then,  
15 of course, we merged a school. So it was kind of like  
16 in the middle between 20, 20.5 Jones Elementary  
17 School.

18 I mean, I was responsible for supporting schools  
19 first around the high-needs grant. We had what was  
20 called a SIG grant, a school improvement grant. They  
21 received additional dollars up to sometimes 1.5 to 1.7  
22 million dollars to employ additional resources.

23 After we did an assessment of each school, it  
24 was the responsibility of the principals/my team to  
25 ensure that these resources were being used to close

1 gaps for students quickly, because in priority  
2 schools, there are huge gaps around academics, social  
3 needs for kids. You know, there could be discipline  
4 issues. You may need additional counselors,  
5 additional special education teachers.

6 So based on those assessments per school, we  
7 were able to ask the State through a grant for  
8 additional funds so that each school that was  
9 identified as priority could close those gaps quickly.

10 I was responsible for managing that grant as  
11 well as making sure that teachers and principals were  
12 able to get the resources that they needed should they  
13 need additional resources.

14 Q. Okay. Well, let me ask you this then: In terms  
15 of supervisors, it sounds like what you are telling me  
16 is you were more -- you dealt more with the funding  
17 portion and making sure that the priority schools had  
18 the proper funding?

19 **A. Well, it was funding, but it was also**  
20 **supervising those that supported the principals. So I**  
21 **had executive directors. Executive directors' roles**  
22 **were -- they were assigned to support principals,**  
23 **observe principals, talk to them, you know, see what**  
24 **their challenges were, what their needs. We did what**  
25 **was called walk-throughs, inquiry cycles where we**

1 looked at the teaching and learning in the school as  
2 well as creating a plan to address gaps that were  
3 identified during those walk-throughs.

4 So I actually met every Monday and every Friday  
5 with the executive directors because I wanted to make  
6 sure they was in the schools on Tuesday, Wednesday,  
7 and Thursday. We could come back and see if what you  
8 saw on Monday, when you observed Tuesday, Wednesday,  
9 and Thursday, what you told me was happening, was  
10 there any change on Fridays. And if we didn't do it  
11 every week, we would do it biweekly, and then, of  
12 course, we had a day that was scheduled --  
13 prescheduled with the principal, no pop quizzes, where  
14 you would really, you know, evaluate it.

15 But we had scheduled times where we would go  
16 into the school, do that walk-through, and actually  
17 have the teachers and the principals debrief with us  
18 around what those challenges or even successes that we  
19 saw in the school were.

20 So I did deal with a lot of the funding, but I  
21 also was responsible for supervising the executive  
22 directors who directly supervised the principals.

23 Q. Okay. And so then for someone like -- let me  
24 ask you this: How many priority schools did you have  
25 at Metro in the 2019-2020 school year? Do you know?

1 A. It was 23 priority schools.

2 Q. How many were high schools?

3 A. Two. I had Maplewood High School and Whites  
4 Creek High School.

5 Q. What about Pearl-Cohn?

6 A. Pearl-Cohn was not one of the schools that I was  
7 responsible for supervising.

8 Q. Okay. Was Pearl-Cohn a priority school?

9 A. Not when I was hired. Pearl-Cohn in 2019 was  
10 not identified as a priority school.

11 Q. Okay.

12 A. They were not under my supervision.

13 Q. Do you know whether or not Pearl-Cohn -- were  
14 all the priority schools under your supervision?

15 A. From my understanding, any priority school that  
16 had been on the list that the State identified --  
17 remember now, the State has a designation where they  
18 identify priority schools. You could have been a  
19 priority school that had just come off the list maybe  
20 a year before, but if you were not receiving SIG  
21 dollars, school improvement grant funds, when you were  
22 entitled to receive school improvement grant funds,  
23 then you received the support from our team. Right?  
24 Because we had people who were deployed to the school  
25 as part of our SIG grant, and so our team never

1 supported Pearl-Cohn during my tenure at Metro  
2 Nashville Public Schools.

3 Q. Did you know whether or not Pearl-Cohn had been  
4 a priority school?

5 A. So let me just share a little bit about my  
6 previous life. For Memphis, I was the -- what was  
7 called the iZone regional superintendent. So part of  
8 my role was responsibility with turning around and  
9 supporting. So there were 85 schools deemed to be on  
10 the priority school list in 2012.

11 Out of those 85 schools, 69 of those schools was  
12 in Memphis. So I was familiar with the list of  
13 schools who were in the bottom 5 percent. That's what  
14 we are calling priority schools. Right?

15 Q. Uh-huh.

16 A. So I'm sure I knew that Pearl-Cohn was formerly  
17 on the list, but part of me being in Metro Nashville  
18 Public Schools was to employ and support schools that  
19 were on the list so we can get them off.

20 That has been my track record. That has been my  
21 success story even as far as Washington, D.C. I was  
22 deemed a Leader to Learn From from Ed Week simply  
23 because as a regional superintendent in Memphis I was  
24 able to go in, identify challenges, identify  
25 successes, support principals, teachers and leaders

1 and, of course, close gaps.

2 Q. Okay.

3 A. Saying that to say I'm sure I have heard or knew  
4 that Pearl-Cohn was a school on the priority school  
5 list, but it was not under my tenure or my supervision  
6 at the time that I was hired to be the chief of  
7 innovation.

8 Q. Okay. So when you were hired as the chief of  
9 innovation at Metro Schools, there were 23 schools  
10 that reported to you?

11 A. Uh-huh.

12 Q. Two were high schools?

13 A. Uh-huh.

14 Q. Correct?

15 A. Uh-huh.

16 Q. And that was Maplewood and Whites Creek?

17 A. That is -- yes, I forgot you can't say "uh-huh."

18 Yes. But I also was responsible for 30 charter  
19 schools -- I do want to add that -- as well as five  
20 MSAP schools -- no, four MSAP. No, it was five MSAP  
21 schools.

22 Q. What schools?

23 A. They are Magnet Student Assistant Program  
24 schools. They are also schools -- I had two of them  
25 that was actually on the priority school list that was



1 receiving additional grant funds, and so those schools  
2 received funds to close gaps as well based on  
3 subgroups. Normally they had a large subgroup that  
4 did not, of course, make adequate progress.

5 MS. STEINER: Is the court reporter able to  
6 follow this, or are we going a little too fast?

7 THE WITNESS: I'm going too fast. I'll slow  
8 up, sweetie.

9 She is just so kind over here. Okay, I'm gonna  
10 to slow up.

11 THE REPORTER: Yeah, it's -- I'm hanging on  
12 by the skin of my teeth. So slowing down would be  
13 great.

14 THE WITNESS: I'll slow down, and I'll talk  
15 slower.

16 THE REPORTER: That's great.

17 THE WITNESS: You know, I'm going to. I  
18 just can't help it.

19 THE REPORTER: And I'm getting it, but, yes,  
20 slowing down would be very helpful. Thank you.

21 BY MS. STEINER:

22 Q. Okay. Dr. Griffin, just a question for you, for  
23 the five magnet schools -- and this could be a really  
24 dumb question -- I thought magnet schools meant that  
25 that school is doing better?

1 A. Well, for this particular -- MSAP, that was a  
2 school where -- magnet schools may mean that in that  
3 sense, but for this particular grant, it's called the  
4 M-S-A-P, MSAP grant, and the whole purpose of the  
5 grant is to employ additional resources into the  
6 schools to attract -- that's where magnet comes  
7 from -- to attract additional students to these  
8 schools.

9 Normally, their enrollment may have been low. A  
10 particular subgroup may have experienced challenges,  
11 and, of course, we want to expose students, of course,  
12 in these schools to programs that they may not be  
13 exposed to in other particular schools.

14 For example, there was a dance program at one of  
15 the schools. One of them was a STEM program, you  
16 know, that normally would not have been in the school,  
17 and so the magnet grant allowed for these schools to  
18 have additional resources into schools where normally  
19 it would not exist.

20 Q. Okay. So then it may be called a magnet grant,  
21 but it wasn't necessarily --

22 A. A magnet -- right, it's not a magnet school. An  
23 MSAP school is a school that receives the MSAP grant,  
24 and we just call it magnet because we're trying to  
25 within the five year -- the grant is for five years,

1 and what we are trying to do is attract students to  
2 the schools to ensure that the program is sustainable.

3 So when you think about a grant, Ms. Steiner, I  
4 want you to think about the whole purpose of a grant  
5 is so that you can put in resources, close gaps, but  
6 sustainability is the key, because grants don't last  
7 forever. They have a shelf life, and what you want to  
8 do is still be able to continue the program when the  
9 grants go away. Right?

10 And so with the priority schools, what we were  
11 trying to do is close gaps quickly, employ strategies  
12 and close those gaps, and then when the grant ends,  
13 hey, we've built up teachers. We have closed gaps for  
14 students. We have even garnered additional resources  
15 from the district that, instead of getting a grant,  
16 you just anyway pay teachers more if they are working  
17 with the neediest kids.

18 Q. Now, you can tell you are a teacher.

19 A. Oh, okay.

20 Q. But let me just ask you this just to make sure  
21 that I understand this. You don't have to go into the  
22 longer explanation.

23 A. Okay. Yes, ma'am.

24 Q. So even though you said that you had five  
25 magnet --

1 A. We'll just say MSAP schools.

2 Q. Yes, that doesn't mean like Hume-Fogg or --

3 A. Oh, no, no, no, no, no. These schools had huge  
4 gaps. Actually, two of them were priority schools.  
5 Right? I had two of them that were actually priority  
6 schools. They just received -- it was Rosebank  
7 Elementary, and let me see. What school was Ricky  
8 Gibbs at? He was at Warner Elementary. Those were  
9 two priority schools that also received MSAP funds.  
10 So those MSAP funds allowed even additional funds to  
11 be pumped into the school to close gaps.

12 Q. Of the 23 schools, you had two that were high  
13 schools. How many did you have as middle schools?

14 A. Middle schools was -- I think middle schools was  
15 nine. Let's see. I want to say I had nine middle  
16 schools.

17 Q. Okay. Just approximate.

18 A. Around 9 middle schools and 11 or 12  
19 elementaries.

20 Q. Thank you. So then the person who was  
21 responsible for the principals, for supervising the  
22 principals, would have been the executive director.

23 Correct?

24 A. Yes, ma'am, the executive directors was  
25 responsible.

1 Q. And for Whites Creek, that would have been  
 2 Renita Perry. Correct?  
 3 **A. Yes, Renita Perry, uh-huh, for the 2019 -- yeah,**  
 4 **Renita Perry for 2019.**  
 5 Q. The whole time you were at Metro you were the  
 6 chief of innovation. Correct?  
 7 **A. The entire time, uh-huh.**  
 8 Q. And was Renita Perry an executive director while  
 9 you were there?  
 10 **A. Yes.**  
 11 Q. The whole time?  
 12 **A. The whole time, yes, ma'am.**  
 13 Q. And do you know whether or not her schools  
 14 changed at all while you were there?  
 15 **A. You mean improved?**  
 16 Q. No, the schools you supervised. Do you know  
 17 whether or not they changed at all?  
 18 **A. Yes, they have changed. They changed**  
 19 **actually -- she was a supervisor for high school year**  
 20 **one, and then year two we had -- because we were in**  
 21 **COVID. What is Shea's real name. I forgot Shea --**  
 22 Q. Snorten?  
 23 **A. Snorten, yes, Snorten.**  
 24 Q. Okay. And did Ms. Snorten -- when she took over  
 25 to be the executive director for the high schools, did

1 she perform basically the same type job duties as  
 2 Renita Perry?  
 3 **A. She did. The role of the executive director for**  
 4 **priority schools didn't change. Remember, we were**  
 5 **grant funded. We had expectations from the Tennessee**  
 6 **Department of Ed, and so even though we changed -- you**  
 7 **know, the name of the supervisor changed, the**  
 8 **responsibilities did not change because the grant and**  
 9 **those of us who were supporting schools, we had**  
 10 **milestone visits and all of that during the course of**  
 11 **a year from the TDOE --**  
 12 THE REPORTER: From the what? Excuse me.  
 13 **A. TDOE is Tennessee Department of Education. All**  
 14 **of this funding came from TDOE. So when you have**  
 15 **funding that comes from TDOE, then you have to make**  
 16 **sure that you're spending the money appropriately, and**  
 17 **so they have visits.**  
 18 **And so, you know, part of the role of an**  
 19 **executive director had to be clearly identified and**  
 20 **explained in that grant, and so it was not different**  
 21 **from what Executive Director Perry did.**  
 22 BY MS. STEINER:  
 23 Q. Okay. Okay. And so then just for the record,  
 24 the position of executive director that reported to  
 25 you from the time you got there until the time you

1 left stayed the same. Correct?  
 2 **A. The roles and responsibilities of the job stayed**  
 3 **the same for priority schools because our job**  
 4 **descriptions were written by the -- were written in**  
 5 **alignment with the grant. Right?**  
 6 Q. Okay.  
 7 **A. We even -- we did several things different from**  
 8 **the district, because, again, our responsibility was**  
 9 **to move schools quickly providing with -- with the**  
 10 **additional provided resources. So I even had**  
 11 **additional staff versus what other people had that was**  
 12 **supporting schools.**  
 13 Q. Okay. Now, let me -- I've got some questions  
 14 for you -- well, you had your executive directors  
 15 reporting to you.  
 16 **A. Uh-huh.**  
 17 Q. For the other schools, did those principals  
 18 report to executive directors who reported to the  
 19 associate superintendents? Do you know?  
 20 **A. I think so, yes.**  
 21 Q. Did you know Dr. Pippa Meriwether?  
 22 **A. Yes, I did.**  
 23 Q. Do you know that she was an associate  
 24 superintendent?  
 25 **A. I did.**

1 Q. And did you see the way she performed her job  
 2 duties as an associate superintendent?  
 3 **A. Well, we were in same settings, absolutely, yes,**  
 4 **because, remember, the associate supes, and the**  
 5 **workload they had and what they did was a little bit**  
 6 **different from priority schools. Right? So their**  
 7 **schedule, even their inquiry cycle, which is our**  
 8 **walk-throughs where we go in and observe, we did them**  
 9 **every month versus they did schools on a cycle. We**  
 10 **did schools every single month. So it was a little**  
 11 **bit different.**  
 12 **We had some large meetings, principal meetings**  
 13 **and all of that, where we interacted, but the work**  
 14 **looked a little bit different as it relates to seeing**  
 15 **them often.**  
 16 Q. Okay. And what was your opinion as you watched  
 17 Dr. Pippa Meriwether doing the job with regard to her  
 18 competence?  
 19 **A. I thought she was a great associate supe.**  
 20 Q. Did she seem to be dedicated to Metro Schools?  
 21 **A. Yes.**  
 22 Q. Did she seem to be intelligent in understanding  
 23 job duties?  
 24 **A. Yes.**  
 25 Q. Did you ever hear anyone put forth any complaint

1 about Dr. Pippa Meriwether?  
 2 **A. I did not, no.**  
 3 Q. Okay. Did the executive directors that were in  
 4 the normal schools -- is that a fair statement? Can I  
 5 call them normal schools?  
 6 **A. Well, I wouldn't say "normal." I would say**  
 7 **nonpriority. I wouldn't say normal.**  
 8 Q. Thank you. For the executive directors that  
 9 worked in the nonpriority school settings, did those  
 10 job positions change at all while you were at Metro  
 11 Schools?  
 12 **A. I'm not sure, because that was not my lane. So**  
 13 **I'm not sure. I did not work with those executive**  
 14 **directors, so I'm not sure.**  
 15 Q. Did anyone ever tell you that those job  
 16 positions were going to change?  
 17 **A. Well, when you say "job positions," you mean**  
 18 **role responsibilities or people moving around,**  
 19 **everybody had to reapply? I'm not clear on the**  
 20 **question.**  
 21 Q. Did anyone ever tell you that the  
 22 responsibilities for the executive directors for the  
 23 nonpriority schools were going to change at any point  
 24 when you were at Metro?  
 25 **A. No, I don't remember that, no.**

1 Q. Okay. Did you know Dr. Lily Leffler?  
 2 **A. I saw her. I didn't know her personally. I saw**  
 3 **her and knew that she was an executive director.**  
 4 Q. Did you have any opinion about the way she  
 5 performed her job?  
 6 **A. I did not see her as often. Again, an executive**  
 7 **director, in my interaction, was very different than**  
 8 **an associate supe. The associate supe was part of the**  
 9 **extended cabinet. We were in meetings and all of**  
 10 **that.**  
 11 **Executive directors were more of a school**  
 12 **supervisor. They supervised principals. So I did not**  
 13 **see her as much as I would have seen or I did see the**  
 14 **associate supes.**  
 15 Q. Did you ever have any contact with Dr. Leffler  
 16 where you thought she was rude or difficult to get  
 17 along with?  
 18 **A. I did not.**  
 19 Q. Did you hear of anybody else complaining that  
 20 Dr. Leffler was rude or difficult to get along with?  
 21 **A. I did not.**  
 22 Q. Did you hear of any complaints about  
 23 Dr. Leffler?  
 24 **A. I did not, no.**  
 25 Q. Okay. Were you in any of the meetings that

1 Dr. Battle would have with the associate  
 2 superintendents for the nonpriority schools?  
 3 **A. Yes, we would have meetings on -- I want to say**  
 4 **they may have been on Mondays, leadership team**  
 5 **meetings. I was a part of the cabinet. So they**  
 6 **weren't in our cabinet meetings, but we did have large**  
 7 **group meetings with the leadership teams.**  
 8 Q. Did you know that Dr. Leffler was kin to an  
 9 ex-employee named Vanessa Garcia?  
 10 **A. No, and I don't know Vanessa Garcia either.**  
 11 Q. Did you know that Dr. Garcia had sued the  
 12 district for subjecting her to a sexually hostile work  
 13 environment and then retaliating against her by  
 14 eliminating her position?  
 15 **A. No, ma'am. Don't know.**  
 16 Q. Did you know -- did you ever hear Dr. Battle  
 17 question anyone about Dr. Leffler's loyalty to the  
 18 school systems because of her connection to  
 19 Dr. Garcia?  
 20 **A. I did not, no.**  
 21 Q. Okay. Did you know Dr. Damon Cathey?  
 22 **A. I did. I knew Dr. Cathey and still know, yes.**  
 23 Q. Do you like Dr. Cathey?  
 24 **A. I do. I like Dr. Cathey.**  
 25 Q. Did you think Dr. Cathey was very confident in

1 his job as an associate superintendent?  
 2 **A. I did. I got to see him as well.**  
 3 Q. Did you think he was honest?  
 4 **A. I did. I had no reason to not think that.**  
 5 Q. The same thing with Dr. Meriwether. Did you  
 6 think she was honest?  
 7 **A. I did.**  
 8 Q. Okay. And did you by any chance know that  
 9 Dr. Cathey had reported grade falsification by any  
 10 chance?  
 11 **A. No, I did not, no.**  
 12 Q. Is grade falsification illegal in Tennessee?  
 13 **A. I think the word "falsification" would justify**  
 14 **that in any case, not just Tennessee, but falsifying**  
 15 **grades I would think is illegal, yes, in Tennessee.**  
 16 **I'm not a lawyer, but, yes.**  
 17 Q. Did you by any chance know that Dr. Cathey had  
 18 recommended that a teacher -- I believe it was a  
 19 principal -- be fired for grade falsification?  
 20 **A. I'm trying to think did I hear that or did I --**  
 21 **I may have -- I may have -- I don't know if I talked**  
 22 **to Dr. Cathey and that was -- I may have heard that a**  
 23 **principal -- of course, you know, me being new to the**  
 24 **district, I may have heard that someone was**  
 25 **recommended to be fired that wasn't.**

1 Q. And do you know why that principal wasn't fired?  
 2 **A. I do not. You know, I didn't come until 2019.**  
 3 **So from my understanding, that was all pre2019.**  
 4 Q. But it was your understanding that somebody had  
 5 had -- recommended that a principal be fired for grade  
 6 falsification?  
 7 **A. Uh-huh, yes.**  
 8 Q. Is that a yes?  
 9 **A. That's a yes, yes.**  
 10 Q. You are doing very good.  
 11 **A. I think that's a yes.**  
 12 Q. You're doing very good.  
 13 And did you think that a principal should be  
 14 fired if they are engaging in grade falsification?  
 15 **A. Well, as a former principal, I feel like ethics**  
 16 **and your moral compass should guide everything that we**  
 17 **do. So I would hate to think that something was done**  
 18 **for a child that I would not want done for my own,**  
 19 **good or bad. I don't want you to get an A you didn't**  
 20 **deserve. I don't want you to get an F that you didn't**  
 21 **deserve.**  
 22 **So I think that as a principal, after fully**  
 23 **investigating, if the evidence suggests that something**  
 24 **was done that -- a consequence -- I'm not going to say**  
 25 **necessarily fired, but I think that a consequence**

1 **definitely should be had for any kind of injustice**  
 2 **that was done for a nonearned A and a nonearned F and**  
 3 **in between.**  
 4 Q. Do you have any knowledge about why the  
 5 principal was not disciplined for the grade  
 6 falsification?  
 7 **A. I do not. So I don't have the contextual**  
 8 **narrative before I arrived of any of the -- you know,**  
 9 **what was happening. So, no.**  
 10 Q. Okay. It's my understanding that -- did you  
 11 know whether or not the school district went through  
 12 any sort of a reorganization in the 2020 -- spring of  
 13 2020 to the fall of 2020?  
 14 **A. Yes, it was communicated that a reorganization**  
 15 **was going to occur for the district. As a matter of**  
 16 **fact, the executive directors that I have or had when**  
 17 **I left the district from the time of the**  
 18 **reorganization was actually hired during that**  
 19 **reorganization.**  
 20 **So not only did the executive directors for**  
 21 **nonpriority but we even looked at the whole cohort of**  
 22 **executive directors. So my executive directors that I**  
 23 **had prior to the reorg also had to reinterview as part**  
 24 **of the reorg process.**  
 25 Q. Do you know why they had to reinterview?

1 **A. I think it was just a reorganization that was**  
 2 **taking place. I've gone through so many. So ...**  
 3 Q. Were you given any reason why an employee who  
 4 was doing their job was going to have to reinterview  
 5 for their job?  
 6 **A. Well, and I do think that as a person who has**  
 7 **done this work for a long time, if the district is**  
 8 **going into a different direction when new leadership**  
 9 **comes, it is their -- I mean, they can reorg at any**  
 10 **time. We serve at the will of the superintendent. If**  
 11 **that's a desire, then that's what -- that's part of**  
 12 **being the leader of the district or, you know, an**  
 13 **organization.**  
 14 **I have reorged, and I'm only saying that because**  
 15 **if you have to go into a different direction to do**  
 16 **what's best for kids, then that's what we have to do.**  
 17 **So I don't question when there's a reorganization,**  
 18 **especially if it's deemed necessary by the leader in**  
 19 **charge.**  
 20 Q. Were you given any reason for the  
 21 reorganization?  
 22 **A. I don't remember the reason for the**  
 23 **reorganization. So, no.**  
 24 Q. Okay. But it was your understanding there was  
 25 new leadership, and that would have been Dr. Battle.

1 Correct?  
 2 **A. Uh-huh.**  
 3 Q. Is that yes?  
 4 **A. That's a yes. I'm sorry, I'm going to do**  
 5 **better. That's a yes.**  
 6 Q. Okay. And so the decision to do the  
 7 reorganization, was that a Dr. Battle decision?  
 8 **A. Well, it was communicated to us by the**  
 9 **superintendent. So collectively I don't know if it**  
 10 **was made in isolation, but it was communicated to us**  
 11 **from the superintendent.**  
 12 Q. Okay. Now, it's my understanding that you --  
 13 and correct me if I'm wrong, but you were one of the  
 14 interviewers for the executive director positions?  
 15 **A. Yes, because, remember, my three executive**  
 16 **directors -- actually, I lost an executive director**  
 17 **who retired. So I was looking for additional people**  
 18 **to support priority schools anyway. So, yes, I was a**  
 19 **part of that because I was even open to the idea that**  
 20 **a person I didn't have that sat as an executive**  
 21 **director or even applied that I didn't know was a fair**  
 22 **candidate for me to even select outside of the ones**  
 23 **that I had.**  
 24 Q. Who retired?  
 25 **A. Her name was Tracy.**



1 Q. McPherson?

2 **A. McPherson. She retired. So I had an opening**

3 **anyway.**

4 Q. Okay. Now, do you know -- hang on a second. Do

5 you know Susan Cochran?

6 **A. Susan Cochran? I don't remember a Susan**

7 **Cochran.**

8 Q. Do you know Robin Shumate?

9 **A. Robin Shumate. I don't know them well enough**

10 **for it to just jump off, but did she work in -- I'm**

11 **going to say no because if I can't recall like that, I**

12 **don't know you.**

13 Q. Okay. But Tracy McPherson, she had decided that

14 she was retiring at the end of the 2019-2020 school

15 year. Is that right?

16 **A. Uh-huh, she was retiring. She did retire.**

17 Q. And do you know what her age was approximately?

18 **A. Ooh, I don't know her age approximately, but she**

19 **had enough years to retire. So ...**

20 Q. Okay.

21 **A. Her reason was retirement. That's what -- I**

22 **mean, that's public knowledge. That's what she**

23 **shared, retirement.**

24 Q. Good. And did she let you know that timely?

25 Did she give timely notice that she didn't want to

1 come back the next year, that she was retiring?

2 **A. In enough time that she didn't even interview**

3 **for the position. I knew -- she told us in enough**

4 **time that she didn't even interview for the reorg**

5 **position. She didn't interview. She retired.**

6 Q. Now, you were one of the interviewers, though.

7 Correct?

8 **A. Yes.**

9 Q. Okay. And that was for the executive directors

10 for -- whether it be priority schools or nonpriority

11 schools. Correct?

12 **A. Right.**

13 Q. Okay. And so everyone that was an executive

14 director got to reinterview if they wanted the

15 position. Correct?

16 **A. Yes.**

17 Q. Okay. And were all of the ones who interviewed

18 for the executive director position -- were they all

19 competent?

20 **A. You said were they all -- you went out. Say it**

21 **again.**

22 Q. Were they all competent to do that job?

23 **A. Every single person that interviewed?**

24 Q. Yes. If you got an interview, were you

25 considered to be -- you had the credentials that you

1 do the executive director job?

2 **A. Well, HR did the screening. So I can't share**

3 **with you a person's competency, but trusting HR and**

4 **those who -- of course, the HR chief was a former**

5 **principal and teacher. We interview time, schedule,**

6 **and all of that based on HR. They created the**

7 **schedule and everything.**

8 **My role was to push and ask -- I was able to ask**

9 **additional questions, because remember now, I was**

10 **looking for someone that could do the traditional role**

11 **of what an executive director does, but because we had**

12 **some additional responsibilities, of course, I asked a**

13 **few more additional questions based on, you know, the**

14 **interview process.**

15 Q. And so then HR picked the ones -- the candidates

16 that got to interview for the position. Correct?

17 **A. They selected and scheduled.**

18 Q. And would that have been Lisa Spencer?

19 **A. I don't know if it was Lisa Spencer, but Lisa**

20 **was one of the persons in HR that was responsible for**

21 **the email communicated to us of the times and who was**

22 **going to be interviewed. So as far as the selection**

23 **process, you know, that would have to go with HR, but**

24 **that was a person who communicated times and who would**

25 **be interviewed because it was all via Zoom. It was**

1 **Zoom call.**

2 Q. Who else interviewed besides you?

3 **A. Oh, goodness. Myself, Chris Barnes, I guess**

4 **Dr. Battle. I don't remember who else. I know the**

5 **three of us for sure.**

6 Q. Okay. Did you at any point tell anybody, We

7 need more candidates for this interview because these

8 people aren't good enough?

9 **A. Absolutely not, no.**

10 Q. Did you feel like the ones that you interviewed

11 were qualified for the position?

12 **A. The ones that I interviewed?**

13 Q. Yes.

14 **A. When you say was "qualified," we had a rubric.**

15 **Right. So I can't remember specifically what each**

16 **person's score was on the rubric, but we did have a**

17 **rubric. So I can't say all and make that general**

18 **statement.**

19 Q. Okay.

20 **A. But I was able to select three executive**

21 **directors based on observations.**

22 Q. Did you get to select yours before or after the

23 other executive directors for nonpriority schools were

24 picked?

25 **A. That, I don't know. I don't know the timing of**

1 **who selected when and how. I don't know.**  
 2 Q. How did you select yours? Did you go in and  
 3 say, I want Renita Perry, I want this one, and I want  
 4 that one, or did you send an email?  
 5 **A. Did not send an email. I want to say we had a**  
 6 **Zoom call, and, of course, we discussed -- I know I**  
 7 **talked with Chris Barnes. I discussed specific**  
 8 **qualities for candidates and what I know I did it for**  
 9 **each of the schools, you know, because by then I had**  
 10 **already been with the schools for a year.**  
 11 **And so, again, the way that I select and have**  
 12 **been trained and do it in the turnaround space is you**  
 13 **look at what the schools need and you look at the**  
 14 **skill set of the candidates and align that with who is**  
 15 **selected for the role, and that's what I did.**  
 16 Q. Sure. Were you the decision maker, too? Did  
 17 you have input into the decision for the executive  
 18 directors to be picked for the nonpriority schools?  
 19 **A. I did not.**  
 20 Q. Who picked the executive directors for the  
 21 nonpriority schools?  
 22 **A. I am not sure. I can't say for sure who picked**  
 23 **those, but I was allowed to select the priority**  
 24 **schools.**  
 25 Q. So then you interviewed the candidates --

1 **A. I did.**  
 2 Q. -- for executive director, whether it be  
 3 priority or nonpriority schools, and you scored them.  
 4 Correct?  
 5 **A. There was a rubric. Everything was electronic.**  
 6 Q. Okay. Now, do you recall interviewing with Lily  
 7 Leffler?  
 8 **A. I sat in all of them. So I'm saying yes, yes.**  
 9 Q. Do you recall what you thought about Dr. Leffler  
 10 in terms of her qualifications?  
 11 **A. I don't recall, no.**  
 12 Q. Okay. Do you recall whether or not you thought  
 13 she was qualified?  
 14 **A. I don't recall. I just don't recall.**  
 15 Q. Do you recall -- would you agree that it's  
 16 important when you are scoring these candidates to  
 17 have the same interviewers for each candidate?  
 18 **A. Okay, ask that question again now.**  
 19 Q. Do you agree that it would be important to have  
 20 the same interview scores for each candidate, meaning  
 21 it would not be fair to have you interview one  
 22 candidate and then have Dr. Cathey interview the next  
 23 because you may score differently?  
 24 **A. Oh, yes.**  
 25 Q. Okay. And did you know that some of the

1 candidates were interviewed by different interviewers?  
 2 **A. I did not, no.**  
 3 Q. Would you agree that that could throw the  
 4 scoring of the candidates into not being consistent?  
 5 **A. Well, I think, based on what you have heard me**  
 6 **say in this interview, that we bring a unique set of**  
 7 **experiences where what I interpret as a score could be**  
 8 **very different if someone else is scoring the same**  
 9 **candidate that's different from everybody else. So**  
 10 **with that being said, I think it's important to**  
 11 **consistently have, you know, scores.**  
 12 Q. Okay. And would you agree that the scores would  
 13 not be validated? They are not valid scores if you  
 14 have different interviewers come in?  
 15 **A. When you say "valid scores," you mean by**  
 16 **changing the scores are the scores invalid?**  
 17 Q. By having different interviewers who may have  
 18 different methods of scoring, meaning one could be  
 19 harsher or one could be more lenient, would you agree  
 20 that that would invalidate the scores?  
 21 **A. I don't know if I would say "invalidate," but I**  
 22 **would say that it brings a different perspective,**  
 23 **because I don't know that the scores alone is only the**  
 24 **qualifying factor. And so that's why I'm saying it**  
 25 **like that.**

1 Q. Meaning were there some executive directors that  
 2 you felt like were going to get their jobs regardless  
 3 of their scores?  
 4 **A. Oh, no, absolutely not. I did not, no.**  
 5 Q. Did you know -- do you recall Dr. Lily Leffler's  
 6 interview where Dr. Chris Barnes was having trouble  
 7 with Zoom and he could not hear the questions? Do you  
 8 recall that?  
 9 **A. I do not. That was ...**  
 10 Q. Okay.  
 11 **A. These interviews -- can you help me? These**  
 12 **interviews were like March or April of 2020?**  
 13 Q. I think they were more akin to June of 2020.  
 14 **A. Okay, June of 2020. I'm just trying to -- okay.**  
 15 Q. Okay. Now, do you -- would you agree that if  
 16 Dr. Barnes could not connect by Zoom to hear the  
 17 questions and the answers, would you agree that he  
 18 should not be allowed to score a candidate?  
 19 **A. Well, I agree that I think that you should --**  
 20 **the candidate should have a fair chance to be heard.**  
 21 **So you said would not be allowed to score?**  
 22 Q. Yes, should not be allowed to score if they  
 23 can't hear the questions and they can't hear the  
 24 answers.  
 25 **A. I would agree. I would agree.**

1 Q. Okay. And did you know that the next day  
2 Dr. Barnes had a discussion with Dr. Leffler, but he  
3 didn't ask her any questions, all he did was talk to  
4 her about the position with no questions asked? Did  
5 you know that?  
6 **A. No, I did not know that.**  
7 Q. Okay. Did you know that when he did that he  
8 scored her the lowest?  
9 **A. No.**  
10 Q. Okay. Did you know that some of the scores were  
11 missing?  
12 **A. No, I did not.**  
13 Q. Did you by any chance interview a gentleman  
14 named Chad High?  
15 **A. Chad High, did I interview -- I cannot remember.**  
16 **I cannot remember if I interviewed Chad High. I know**  
17 **Chad is an executive director. I cannot remember if I**  
18 **interviewed Chad High, no.**  
19 Q. Did you know that there was a first group of  
20 interviews, and then people were informed that they  
21 did not get the job, and then there was a second group  
22 of interviews?  
23 **A. No. HR is the one that informed us of every**  
24 **single interview. So I don't know the process prior**  
25 **to that. We were selected to be on the interview**

1 **panel based on the time and the candidates from HR.**  
2 Q. Do you know who told the individual candidates  
3 they would not get the position?  
4 **A. I do not.**  
5 Q. Did you or anyone to your knowledge on the  
6 interview panel say Lily Leffler is not going to get  
7 this position that sent her a denial letter?  
8 **A. No, I'm not aware of that.**  
9 Q. Did you form any opinion that Dr. Leffler should  
10 not become an executive director?  
11 **A. No, did not.**  
12 Q. Do you have any idea who made the decision that  
13 Dr. Leffler should not be an executive director?  
14 **A. No.**  
15 Q. Do you know where the decision was made?  
16 **A. Where it was made?**  
17 Q. What department it was made in.  
18 **A. Well, from my understanding, even before we**  
19 **started the process, the interview process and the**  
20 **scores was going to determine -- and I guess if we**  
21 **needed additional conversations was going to determine**  
22 **whether a person was identified as the person who got**  
23 **the job because that's the process that I used to**  
24 **select my executive directors.**  
25 **So I'm saying that to say no, we don't -- I**

1 **mean, the scores and other qualitative data, the**  
2 **résumé and all of that, from my understanding was the**  
3 **culminating decision.**  
4 Q. But do you know who made that decision?  
5 **A. Human resources, I would think -- no, let me say**  
6 **no. I don't know, no.**  
7 Q. Did anyone ever contact you to say, Hey, Chad  
8 High's scores are missing?  
9 **A. No, ma'am.**  
10 Q. How did you score him?  
11 **A. No, ma'am.**  
12 Q. Do you recall interviewing Chad High?  
13 **A. Well, I recall being in all of the executive**  
14 **directors' interviews. So I'm going to say yes.**  
15 **Because I don't recall not being in any of the**  
16 **interviews of the executive directors.**  
17 Q. When you scored them, did you score them on  
18 paper or did you score them on the computer system?  
19 **A. It was a computer system, and we hit send and**  
20 **sent it.**  
21 Q. Did you save the scores you gave the candidates  
22 on your system?  
23 **A. No, I did not, no.**  
24 Q. Did anyone at any point in time tell you the  
25 system has broken down, and the scores are

1 disappearing?  
2 **A. I didn't -- no, I didn't inquire about the**  
3 **scores.**  
4 Q. If the scores -- if any scores ended up missing,  
5 do you think you should have been made aware of that  
6 request or that statement?  
7 **A. You said should I have been made aware of that?**  
8 Q. Yeah.  
9 **A. No, I think HR, you know --**  
10 Q. Okay.  
11 **A. That's an HR issue.**  
12 Q. Okay. Do you think Dr. Leffler could have been  
13 an executive -- do you think she could have performed  
14 the executive director role in the school of  
15 innovation?  
16 **A. So what I did -- and the way that we selected**  
17 **executive directors was based on the experience in a**  
18 **innovation school. So I don't think Dr. Leffler had**  
19 **any experience in an innovation or priority school**  
20 **before. So based on that, she was not selected from**  
21 **me as a recommendation because I was looking for**  
22 **someone specifically with -- if not prior experience,**  
23 **at least someone who had worked with students.**  
24 Q. Did you think Dr. Leffler could have competently  
25 performed the job as an executive director in a

1 nonpriority school?

2 **A. I can't -- I scored Dr. Leffler and sent those**

3 **scores, but I can't recall exactly what her scores**

4 **were. So I don't want to -- I can't recall her**

5 **scores, but I clearly scored her.**

6 Q. Okay. I assume that everyone that scored

7 Dr. Leffler scored her pretty well -- and I will pull

8 those scores up when we break. Okay?

9 **A. Okay.**

10 Q. Except for Dr. Barnes, would you agree she

11 should have been qualified for an executive director

12 in a nonpriority school?

13 **A. I think qualifications matter on if everybody**

14 **else's scores -- how they were, you know. Candidates**

15 **are selected based on looking at all of the scores and**

16 **seeing who was the candidate potentially aligned with**

17 **the needs of these particular schools, because if it**

18 **was a pretty well score and one person scored --**

19 **somebody else could have hit all excellent, or**

20 **somebody else could have hit exceptional/superior.**

21 Q. We'll talk about those scores in just a second.

22 I'll go through that after we break.

23 **A. Okay.**

24 Q. Now --

25 **A. We was trying to see if we went out. It was**

1 **such a long silence. All right.**

2 Q. We have been going pretty fast.

3 **A. We'll slow down.**

4 Q. Does the evaluations of the executive director,

5 how they perform in their position -- is that taken

6 into consideration or was it taken into consideration

7 when you are deciding who to pick for these executive

8 director positions in the -- I believe it was June of

9 2020? Did prior experience count?

10 **A. Prior experience or evaluation scores? Which**

11 **one?**

12 Q. Both. Prior experience in the position and

13 evaluation scores in the position.

14 **A. I really looked at prior experience. I did not**

15 **review evaluation scores, because, again, I was**

16 **wanting to listen and hear strategies and experience**

17 **around what we needed for priority schools, knowing**

18 **specifically what that was. So I did not look at**

19 **evaluations before making my recommendation.**

20 Q. Okay. Do you know why Chad High was chosen as

21 an executive director?

22 **A. I do not.**

23 Q. Do you know why Chad High was called in to

24 interview for that position after other individuals

25 had been told they were not going to be executive

1 directors?

2 **A. No.**

3 Q. Did you -- were you told that Metro Schools was

4 calling in other candidates to interview?

5 **A. No.**

6 Q. Okay. Were you aware that the executive

7 director positions increased in number from 2019-2020

8 to the 2020-2021 school year?

9 **A. Was it 15?**

10 Q. Yes.

11 **A. Okay. I have three. So 12 -- no, I'm just --**

12 **again, I had only been on the ground for a year, and**

13 **Metro school went through a tornado and then COVID.**

14 **So I don't remember the number that we had even in**

15 **2019.**

16 Q. Can you give me any reason why Lily Leffler was

17 not chosen as an executive director?

18 **A. I cannot, no.**

19 Q. Okay. Now, did you -- were you one of the

20 interviewers for the diversity and equity position --

21 **A. I was.**

22 Q. -- that Ashford Hughes got?

23 **A. I was.**

24 Q. Who were the other interviewers for that

25 position?

1 **A. It was myself, it was Hank Clay, and it was -- I**

2 **don't remember the third person to be honest, but I**

3 **know it was myself and Hank Clay.**

4 Q. Did you know the position requested a master's

5 degree?

6 **A. So let me say this: All of the candidates that**

7 **are selected and from my experience as an experienced**

8 **school leader is screened by HR. So as a person on**

9 **the interview panel, it is my hope that everybody has**

10 **been screened based on what their qualifications are.**

11 **That is my experience with candidates.**

12 **I did not select the candidates. I just sat on**

13 **the panel. It was scheduled, and the names were**

14 **already, you know, identified. So whatever the role**

15 **required, I looked at the job description, the**

16 **questions and all of that, but I would assume that if**

17 **HR selected candidates through the screening process**

18 **that they met the minimum requirements. That has been**

19 **my experience, and it's what I have done as a school**

20 **leader and executive.**

21 Q. Now, hang on a second. Do you think somebody

22 that has a criminal background should be hired for

23 Metro Schools?

24 **A. When you say "criminal background," you mean**

25 **convicted?**



1 Q. Yes, convicted of a crime.  
 2 **A. A crime with children?**  
 3 Q. A crime in general.  
 4 **A. Well, it could be a crime they did that was, you**  
 5 **know -- knowing with the constituents I have served in**  
 6 **the past, I wouldn't say a criminal background just**  
 7 **automatically cancels you out of a role. So, you**  
 8 **know, I would want to get clarity and unpack that some**  
 9 **before I said absolutely not.**  
 10 Q. Would you want to know if a candidate you are  
 11 interviewing has been convicted of DUI?  
 12 **A. No, I would not want to know that.**  
 13 Q. Would you want to know if the candidate you are  
 14 interviewing has been convicted of unlawful possession  
 15 of a weapon?  
 16 **A. Yes, I would want to know that since we are**  
 17 **working with children and buildings and staff, yes.**  
 18 Q. Would you want to know if the person was  
 19 convicted of -- let me see -- violating the implied  
 20 consent law?  
 21 **A. The what kind of law?**  
 22 Q. Implied consent, meaning that when you're picked  
 23 up from driving under the influence, you do not -- you  
 24 will not consent to being -- the breathalyzer test?  
 25 **A. No, that's -- no.**

1 Q. Okay. What about if they had been convicted of  
 2 possession or casual exchange?  
 3 **A. What is that? I'm sorry, but my law background**  
 4 **is not as extensive. What is that?**  
 5 Q. Possession or casual exchange of drugs. Would  
 6 you want to know that?  
 7 **A. I would want to know that, drugs, definitely. I**  
 8 **would want to know that.**  
 9 Q. Okay. And is that because someone that's  
 10 convicted -- supposing they are convicted of  
 11 possession of a weapon unregistered and possession  
 12 of -- casual possession or exchange of drugs and they  
 13 also have a DUI, put all three of those together, is  
 14 that something that you should be made aware of?  
 15 **A. Again, I'm going to say if that has -- I mean, I**  
 16 **think people should be given second chances and third**  
 17 **and all of that. So if it has nothing to do with the**  
 18 **job at hand directly, which is why I said what I said**  
 19 **about the drugs and the weapon, because you can't go**  
 20 **in a school ground with drugs or weapon, you know, but**  
 21 **when you put the DUI with it, it kind of skews me a**  
 22 **little bit because you may not be -- you are not**  
 23 **driving kids around.**  
 24 **Now a bus driver, yes, but if you are not**  
 25 **driving kids around, I don't think that, but the**

1 **weapon and the drugs is very serious because all of**  
 2 **those could play a role, you know, in interacting with**  
 3 **our kids and what happens.**  
 4 **So the DUI, if you are not driving, but when you**  
 5 **put them all three together -- you know, the two**  
 6 **definitely, but all three together, I don't know if I**  
 7 **would say I have to know that, but if it affects your**  
 8 **job description, absolutely.**  
 9 Q. How many people did you interview if you recall  
 10 for the job of executive officer of diversity equity  
 11 and inclusion --  
 12 **A. How many did we interview?**  
 13 Q. Uh-huh, yes.  
 14 **A. I can't remember.**  
 15 Q. Do you recall interviewing Jenai Hayes?  
 16 **A. Uh-huh, I do.**  
 17 Q. I'm going to refer to her as Jane Doe throughout  
 18 this matter. Okay?  
 19 **A. Jane Doe, okay.**  
 20 Q. Do you recall what you thought about Jane Doe as  
 21 you interviewed her, meaning did you think she was  
 22 competent?  
 23 **A. Yes, uh-huh.**  
 24 Q. Okay. Did you think she was intelligent?  
 25 **A. I did.**

1 Q. In fact, would you agree she is very  
 2 intelligent?  
 3 **A. Yes, I have had some -- because, you know, I got**  
 4 **the opportunity to speak with her being in the Choice**  
 5 **Program upstairs even. Then in iZone or innovation**  
 6 **chief, I was able to interact with her some.**  
 7 Q. Did you know that she had a background in  
 8 diversity, equity and inclusion?  
 9 **A. I did. I remember reading her résumé.**  
 10 Q. And did you think it was an impressive résumé?  
 11 **A. I did.**  
 12 Q. Did you tell anyone for any reason that you  
 13 didn't want Jane Doe in that position?  
 14 **A. Absolutely not, did not.**  
 15 Q. Did you think she would have been a competent  
 16 executive officer of diversity, equity and inclusion?  
 17 **A. Based on the interview?**  
 18 Q. Yes.  
 19 **A. Yes.**  
 20 Q. Okay. Did you tell anyone that you thought they  
 21 should hire Ashford Hughes instead of Jane Doe?  
 22 **A. No, based on the scores -- this is the way the**  
 23 **HR process worked. Everything was electronic. You**  
 24 **could add notes in if you so desired, and then, of**  
 25 **course, those notes went to the decision-making, which**

1 is always the superintendent. So it wasn't a mere  
 2 matter of I want this person over that person. It's  
 3 you score, you send in your scores, and then a  
 4 decision is made.  
 5 Q. So you actually scored Jane Doe?  
 6 A. Yes. We actually -- we scored candidates.  
 7 Q. And best you can -- did you -- is it correct --  
 8 based on your testimony today, it seems like you  
 9 probably scored Jane Doe pretty high, didn't you?  
 10 A. Based on the rubric, I don't want to say whether  
 11 I scored them high or low because I want to be exact  
 12 in that sense. So you would have to pull the  
 13 documents.  
 14 Q. Okay. And so you had a rubric that you used for  
 15 the job position of executive officer of diversity,  
 16 equity and inclusion. Correct?  
 17 A. Right.  
 18 Q. And you scored Jane Doe after you interviewed  
 19 her. Correct?  
 20 A. Uh-huh, yes.  
 21 Q. And you sent the score back to whoever got the  
 22 score. Correct?  
 23 A. HR. We always sent them back to HR.  
 24 Q. Now, in this lawsuit, Metro Schools says that  
 25 there are no scores for that interview.

1 A. Okay.  
 2 Q. Okay? Did anyone at all question you about  
 3 whether or not your scores have ended up missing for  
 4 that job position?  
 5 A. No.  
 6 Q. When you knew -- I believe you said you knew  
 7 Jane Doe when she was director of school choice. Is  
 8 that correct?  
 9 A. Uh-huh, yes.  
 10 Q. And did you think she did a very competent job  
 11 as the director of school choice?  
 12 A. Well, I didn't have a lot of interactions with  
 13 the school choice team, but the times that I spoke  
 14 with her, I got what I needed.  
 15 Q. Okay. Did you know she developed the program  
 16 for school choice?  
 17 A. I did not know that, no.  
 18 Q. Did anyone -- after you scored them, did you  
 19 have any discussions with Hank Clay about -- do you  
 20 know whether or not he was another scorer?  
 21 A. Do I know if Hank Clay was one of the scorers?  
 22 Q. Yes.  
 23 A. Yes, that's who I remember, myself and Hank, and  
 24 it was someone else. I can't remember the third  
 25 person. So I don't want to say it without knowing for

1 sure. It was myself and Hank for sure.  
 2 Q. Did you receive an electronic evaluation for  
 3 director of equity and inclusion for Jane Doe?  
 4 A. I did not, no.  
 5 Q. Okay. Do you recall if Chris Barnes was also  
 6 present in any of those interviews?  
 7 A. I'm sure Chris was. I cannot -- he may be the  
 8 third person in the interview.  
 9 Q. Okay.  
 10 A. But I can't -- I can't recall.  
 11 Q. So it was your understanding that you, Hank  
 12 Clay -- what should we call this -- that you and Hank  
 13 Clay, possibly Barnes, interviewed for the position,  
 14 scored for the position, and the decision was made by  
 15 somebody else?  
 16 A. Based on the qualitative and quantitative data  
 17 that we submitted in the interview.  
 18 Q. Meaning the decision of who to hire is not made  
 19 by you or Hank Clay. Correct?  
 20 A. Correct. I only hire executive directors, and  
 21 we make recommendations for principals for priority  
 22 schools. That's it.  
 23 Q. Okay. And that's recommendations for hiring at  
 24 priority schools?  
 25 A. Principals. Recommendation for hiring priority

1 school principals, then, of course, recommendations  
 2 for executive directors, and then it's approved via  
 3 the superintendent.  
 4 Q. Okay. Now, did you know -- did you have any  
 5 knowledge about this lesson that was taught at Waverly  
 6 Belmont called Let's Make a Slave?  
 7 A. Only at the board meeting. I was made aware of  
 8 it at the board meeting. That's not one of -- Waverly  
 9 Belmont was not a priority school, and so I was only  
 10 made aware of that issue because there were several  
 11 parents who came to the board meeting and actually was  
 12 upset about it, and so then, of course, I got a little  
 13 bit of the -- a little bit more of the story.  
 14 Q. Did you know that that lesson made both local  
 15 and, I believe, national news?  
 16 A. Yes.  
 17 Q. Okay. And it was very bad press for Metro  
 18 Schools. Correct?  
 19 A. I don't know about bad press, but it was made  
 20 very public.  
 21 Q. Okay. And did you have any discussions with  
 22 anyone at Metro Schools in the hierarchy about the bad  
 23 press that they got from that lesson?  
 24 A. I did not, no.  
 25 Q. Did you have any knowledge about who -- how the

1 press got ahold of that lesson?

2 **A. I did not, no.**

3 Q. Did you know that Jane Doe's son who has autism

4 was the child involved in that lesson?

5 **A. I did not, no.**

6 Q. Did you know that Jane Doe reported that lesson

7 and complained about it being discriminatory?

8 **A. No, I did not know that, no.**

9 Q. From what you know about that lesson, would you

10 agree that it was discriminatory?

11 **A. I can't remember exactly what the issue -- can**

12 **you summarize what it was and then I can tell you my**

13 **opinion? I can't remember -- I can't remember what**

14 **was the exact issue, but I know it was -- it brought a**

15 **lot of attention to the board definitely, but I just**

16 **can't remember the exact issue.**

17 Q. Is it a fair statement the board was quite upset

18 that this lesson was taught in Davidson County

19 Schools?

20 **A. I don't know if the board was upset, because**

21 **during public comments board members don't talk back**

22 **to the public. So I'm not sure of their reaction to**

23 **what happened, but I can tell you that it was made**

24 **very public on the board floor because several parents**

25 **came to share their opinion about it.**

1 Q. Okay. And the opinions were negative. Correct?

2 **A. Most of them, yes.**

3 Q. Okay. Now, let me -- I'm going to show you

4 something real quick. Let me pull it up. Hang on.

5 I'm getting there. Share the screen.

6 Okay. Can you see the screen? Can you see this

7 thing that is called First Amended Complaint?

8 **A. First Amended Complaint. I can.**

9 Q. I'm going to go down -- and this is in the Jane

10 Doe case for Metropolitan Government of Nashville and

11 Davidson County, Tennessee and Dr. Adrienne Battle.

12 Can you see that at the top of the page?

13 **A. Put the cursor where you want me to read. Jane**

14 **Doe -- I can see that, uh-huh, yes, I can see that,**

15 **yes.**

16 Q. Jane Doe versus the Metropolitan Government of

17 Nashville and Davidson County, Tennessee and

18 Dr. Adrienne Battle. Can you see that?

19 **A. I can.**

20 Q. Okay. Now, and do you see down at the very

21 bottom of the page it's got the case number?

22 **A. Uh-huh.**

23 Q. 3:20-cv-01023.

24 **A. I see that.**

25 Q. I'm going down to where -- the language in there

1 "Let's Make a Slave" language. I want you to read

2 Paragraph 14. And take your time reading it.

3 **A. Okay. (Reading inaudibly.) Oh, wow.**

4 Q. When you are down to the very bottom of the

5 page, let me know, and I will scroll up to the top of

6 the next page. Okay?

7 **A. Can you make it bigger on your screen for me,**

8 **Ms. Steiner? Just a little bigger. I've got these 50**

9 **plus year old eyes here. Ooh, that's smaller.**

10 Q. No, I'll do it. Don't worry. I'm getting

11 there. There you go.

12 **A. Okay, that's much better. Thank you.**

13 **Can you scroll down or up so I can see the rest?**

14 **Oh, Jesus. Okay. Is that it?**

15 Q. Okay.

16 **A. That's enough.**

17 Q. Did you get to Paragraph 15?

18 **A. Oh, wow. Okay. Yes. Um.**

19 Q. Okay. Now, Dr. Griffin, would you agree that

20 that is a racially discriminatory lesson?

21 **A. I would.**

22 Q. Okay. And do you think that that is a lesson

23 that should be given to, I believe, a fourth grader

24 with autism?

25 **A. No.**

1 Q. Okay. Could we have this Amended Complaint for

2 Jane Doe marked Exhibit Number 1 to your deposition

3 today.

4 (Exhibit 1 was marked.)

5 Q. Now, did you know that Jane Doe was the one who

6 complained about this lesson being given to her son?

7 **A. I did not know, no.**

8 Q. Okay. Would you agree that if she had

9 complained about this lesson that that would be

10 something that should be protected activity that Metro

11 Schools cannot retaliate against her for doing?

12 **A. Oh, I agree, yes, with that.**

13 Q. Do you know why within weeks of her complaint of

14 this lesson she lost her job, her job was eliminated?

15 **A. No, I had no idea, no.**

16 Q. Did you know that she applied -- did you think

17 that Jane Doe appeared to be competent for doing many

18 jobs at Metro Schools?

19 **A. When you say "many jobs" --**

20 Q. What I mean is this: Did you know that Jane

21 Doe -- after she was told her position was being

22 eliminated, did you know she applied for 20, 25, 30

23 different jobs at Metro Schools and wasn't hired for a

24 single one?

25 **A. I did not, no.**

1 Q. Would you agree that after -- from what you knew  
2 of Jane Doe and what you saw of her in her interview  
3 that she should have been qualified for many jobs at  
4 Metro Schools?  
5 **A. Well, I can't answer that, because I don't know**  
6 **the qualifications for the jobs she applied.**  
7 Q. Okay. Did you know that HR had made a statement  
8 to one of the HR people that Jane Doe had filed a  
9 lawsuit against the district?  
10 **A. No, I didn't know about -- no.**  
11 Q. Okay. Did you know Dr. James Bailey?  
12 **A. I did, uh-huh, Dr. James Bailey, yes.**  
13 Q. Okay. And his direct supervisor was Renita  
14 Perry. Correct?  
15 **A. Uh-huh, yes, as executive director of priority**  
16 **schools, yes.**  
17 Q. So the person at Metro Schools who would have  
18 the most knowledge about his job performance and how  
19 he did his job would have been Dr. Perry. Correct?  
20 **A. Yes.**  
21 Q. Okay. Now -- and did you know that Dr. Perry  
22 thought highly of Dr. Bailey?  
23 **A. Yes.**  
24 Q. Okay. And did she express that to you?  
25 **A. She did. You know, of course, we talked every**

1 **Monday and Friday about schools, observations, looking**  
2 **at data, all of that.**  
3 Q. Did you know that she felt like Dr. Bailey had a  
4 special connection to the Whites Creek community?  
5 **A. Yes.**  
6 Q. Okay. And did she express that to you?  
7 **A. Yes.**  
8 Q. Is that important to have that special  
9 connection to the community?  
10 **A. It is.**  
11 Q. Okay. Now, did you know Dr. Bailey was teacher  
12 of the year?  
13 **A. For -- teacher of the year?**  
14 Q. Teacher of the year -- principal of the year --  
15 excuse me -- principal of the year for the 2018-2019  
16 school year for the Middle District area of Tennessee?  
17 **A. '18, '19, '20, I may have read that. I think I**  
18 **may have read that in an article, yes. I'll say yes**  
19 **to that, because I normally try to, yes.**  
20 Q. And I think he was awarded that award in  
21 2019-2020 school year. Correct?  
22 **A. Okay.**  
23 Q. Is that --  
24 **A. Yes, I'm aware of that.**  
25 Q. And were you proud of him for getting that

1 award?  
2 **A. Yes, always proud of a principal getting the**  
3 **needed recognition they deserve.**  
4 Q. Well, did anyone at all tell you that award  
5 doesn't count because it's not given by Metro Schools?  
6 **A. Doesn't count toward what?**  
7 Q. Anything. It's a worthless award --  
8 **A. No.**  
9 Q. -- because Metro didn't award it?  
10 **A. That was never told to me, no.**  
11 Q. Do you know whether or not Metro Schools did  
12 anything special for Dr. Bailey as a result of that  
13 award, for instance, announcing it?  
14 **A. I don't know that they did anything, no. I know**  
15 **we announced it within our SOI office. Schools of**  
16 **Innovation is what we called it, SOI. It's SOI for**  
17 **short.**  
18 **So, like I said, any kind of recognition --**  
19 **there is such a stigma associated with priority**  
20 **schools we're also always excited any time our**  
21 **principals, schools leaders or teachers or students**  
22 **even get any kind of attention. So we recognize it in**  
23 **the SOI. I'm not sure if Metro did.**  
24 Q. Not even the principals in the nonpriority  
25 schools get that award. That's a rare award to

1 receive. Correct?  
2 **A. I'm not sure if it's rare now. I don't know**  
3 **about that.**  
4 Q. Do you know if anyone else in Metro Schools got  
5 principal of the year other than Dr. Bailey?  
6 **A. I don't.**  
7 Q. Okay.  
8 **A. Again, I started with Metro in 2019. So some of**  
9 **the precontextual narratives -- I don't know all of**  
10 **them.**  
11 Q. Okay. Now, did you get along well with  
12 Dr. Bailey?  
13 **A. I did, uh-huh.**  
14 Q. Did you like him?  
15 **A. I did like Dr. Bailey, yes.**  
16 Q. Did you think he had a pretty good personality  
17 to be principal?  
18 **A. Did I? Absolutely.**  
19 Q. Would you agree he had the type personality that  
20 is basically needed for a principal's position?  
21 **A. Yes, uh-huh.**  
22 Q. Okay. And did he seem to get along well with  
23 his peers, his supervisor, Dr. Perry, and with you?  
24 **A. He did, yes.**  
25 Q. Okay. And did you give him any evaluation while



1 he was there?  
 2 **A. No, I don't evaluate principals. That's**  
 3 **strictly the executive director's role. My goal is to**  
 4 **ensure and work directly with the State, and the State**  
 5 **looks at data of our schools. I discuss that with the**  
 6 **executive director, so the executive director knows**  
 7 **what type of professional development plan or any type**  
 8 **of supports the school and principal may need.**

9 **So my role is to ensure, number one, that the**  
 10 **State does not take any of our schools, and, number**  
 11 **two, how can we support principals and school leaders**  
 12 **so that we can get them the necessary resources so**  
 13 **that that doesn't happen.**

14 Q. Okay. Did you know that Dr. Bailey as principal  
 15 of Whites Creek had to discipline Dr. Adrienne  
 16 Battle's brother, Coach Battle?

17 **A. I did not know that, no.**

18 Q. Did you know that before you got there that  
 19 Dr. Battle's brother, who was Coach Battle, had beat  
 20 up a parent at the end of a basketball game? Did you  
 21 know that?

22 **A. No, I did not know that, no.**

23 Q. Did you know that Coach Battle had also  
 24 mishandled funds for a --

25 **A. No.**

1 Q. -- fundraiser?

2 **A. No, I did not know that.**

3 Q. Did you know that Dr. Bailey was the person who  
 4 had to recommend that he be nonrenewed by the school  
 5 system, Coach Battle be nonrenewed?

6 **A. I did not, no.**

7 Q. Is it the principal who is responsible for  
 8 making the recommendations for nonrenewal of the  
 9 coaches and teachers who report to them?

10 **A. That's one of the evaluation responsibilities.**

11 Q. Okay. And so then whoever evaluates the person  
 12 is the one who is responsible for making the decision  
 13 about nonrenewals. Correct?

14 **A. You can make the recommendation. That doesn't**  
 15 **mean that's what's going to happen. The principal can**  
 16 **make the recommendation.**

17 Q. Okay. And do you know whether or not Dr. Bailey  
 18 then -- would you agree then that Dr. Bailey was the  
 19 person making -- who was responsible for making the  
 20 recommendation for the nonrenewal of Coach Battle if  
 21 he coached at Whites Creek?

22 **A. Yes, the principal makes the recommendation, and**  
 23 **it goes to HR, human resources when I say "HR," human**  
 24 **resources.**

25 Q. Did you know whether or not Dr. Bailey had to

1 testify in a lawsuit -- in an administrative

2 hearing -- excuse me -- against Dr. Bailey -- Coach  
 3 Battle?

4 **A. No, I did not know that.**

5 Q. Did you know whether or not Dr. Pippa Meriwether  
 6 approved of all of Dr. Bailey's decisions with regard  
 7 to Coach Battle, meaning the nonrenewal, eventually  
 8 the nonrenewal?

9 **A. No, I did not know of any of that.**

10 Q. Would you agree that if Dr. Bailey's  
 11 superintendent was Dr. Pippa Meriwether or associate  
 12 superintendent was Dr. Pippa Meriwether that she would  
 13 be responsible for approving any decision he made  
 14 about Coach Battle and how he should be disciplined?

15 **A. Right. That was -- as a person new to the**  
 16 **district, that was my understanding, that even if a**  
 17 **recommendation for a nonrenewal went to HR that it did**  
 18 **not go there without the approval of the associate**  
 19 **supe, because there have been times when, you know, a**  
 20 **nonrenewal did not go any further because the**  
 21 **principal didn't have appropriate documentation.**  
 22 **Right?**

23 **So it is my understanding that when**  
 24 **recommendations are made to HR as a part of the Metro**  
 25 **team, it went through associate supe. From my**

1 **executive directors, it came through me and then went**  
 2 **up to HR.**

3 Q. Okay. So then if you do have a principal or a  
 4 teacher who is going to be nonrenewed --

5 **A. Uh-huh.**

6 Q. -- is it your understanding that you have to  
 7 have the appropriate documentation in the file?  
 8 Correct?

9 **A. It -- right, you have to have evidence,**  
 10 **findings, documentation, slash, of whatever the charge**  
 11 **is, you know, or the person did not meet.**

12 Q. Okay. And unless you have that documentation,  
 13 you cannot approve a nonrenewal of that person.  
 14 Correct?

15 **A. Well -- and I'm not going to say -- the type of**  
 16 **documentation is important, and so unless it's**  
 17 **something really egregious, you know, it's not the**  
 18 **amount of documentation. That helps, but it's really**  
 19 **the type of documentation, documentation but with**  
 20 **support.**

21 **So you can't just say you didn't do this right,**  
 22 **but it's how did I create a plan of support and then**  
 23 **you didn't get better. That's when we start talking**  
 24 **about nonrenewal. We know we can't fire our way to**  
 25 **effectiveness. So it's documentation.**

<p style="text-align: right;">Page 81</p> <p>1       <b>This is what you did not do appropriately. This</b>  2 <b>is what I'm expecting you to do next. If you don't,</b>  3 <b>then we move nonrenewal unless it's something</b>  4 <b>egregious, you know, physical harm of students and all</b>  5 <b>of that, and then with support -- I always share if</b>  6 <b>you don't have support, then, no, it doesn't</b>  7 <b>automatically go to a firing unless it's super</b>  8 <b>egregious, and we have talked illegal, and it has to</b>  9 <b>be done. So it's documentation with a plan of</b>  10 <b>support.</b>  11 Q.   And documentation, does that include the  12 performance improvement plan?  13 <b>A.   It could, yes, it could. Most times it does.</b>  14 <b>I'm saying it could because, you know, sometimes it's</b>  15 <b>not always a school improvement plan. In an iZone</b>  16 <b>school, it actually could be the support of the team.</b>  17 <b>I have someone in every school every day that's</b>  18 <b>documented. Right? So it could also be those types</b>  19 <b>of supports as well. So, yes.</b>  20 Q.   Okay. And is it a fair statement that  21 Dr. Bailey did not do anything egregious to justify a  22 nonrenewal while you were there?  23 <b>A.   Well, because I did not see it, I cannot answer</b>  24 <b>that. So when you say nonegregious, you are talking</b>  25 <b>about to the person, or are you talking about to --</b></p>	<p style="text-align: right;">Page 83</p> <p>1 students or something that would justify an immediate  2 termination.  3 <b>A.   Right, it could, right, and also we have to</b>  4 <b>remember that principal roles are approved through the</b>  5 <b>superintendent. They report directly to the</b>  6 <b>superintendent.</b>  7       <b>So principals are hired or recommended to the</b>  8 <b>superintendent. That's the person who has the stamp</b>  9 <b>of approval on who is hired, and once you present</b>  10 <b>data, that is a person who also makes a recommendation</b>  11 <b>on who is going to be not in the role.</b>  12 Q.   Did you ever recommend that Dr. Bailey be  13 nonrenewed?  14 <b>A.   Well, I think with principals it's not just not</b>  15 <b>nonrenewed because it wasn't not renewed, but, again,</b>  16 <b>the person who works directly with the State and</b>  17 <b>looking at data, the decision to not bring Dr. Bailey</b>  18 <b>back as a principal was strictly made on the data and</b>  19 <b>the improvement of the school.</b>  20       <b>When I looked at the data -- let me go back.</b>  21       <b>When I was hired as the chief of innovation, my</b>  22 <b>first role and has always been my first assignment is</b>  23 <b>to look at all of the data. You become a priority</b>  24 <b>school based on data. If your school -- if you're in</b>  25 <b>the bottom 5 percent, what that says to us is</b></p>
<p style="text-align: right;">Page 82</p> <p>1 Q.   Did Dr. Bailey do anything that you considered  2 egregious that would justify a nonrenewal?  3 <b>A.   Now, in an SOI school, I think we have to talk</b>  4 <b>about the role the school leadership plays before we</b>  5 <b>talk about egregious, because somebody losing their</b>  6 <b>job is very different from -- because we were talking</b>  7 <b>about an incident that occurred where a person was</b>  8 <b>nonrenewed. So now you are talking about school</b>  9 <b>leadership -- I'm trying to be clear on -- are you now</b>  10 <b>on Dr. Bailey not being renewed, or are you still</b>  11 <b>talking about Battle? I want to be clear here.</b>  12 Q.   I'm asking you a question. You said that if  13 someone is nonrenewed, they need to have the proper  14 documentation in the file. Correct?  15 <b>A.   That is correct, yes, uh-huh, yes.</b>  16 Q.   Does that include principals such as  17 Dr. Bailey --  18 <b>A.   It does.</b>  19 Q.   -- needed to have the proper documentation in  20 the file?  21 <b>A.   It does include principals, yes.</b>  22 Q.   And you said that the only time that you may get  23 rid of them when you don't have the documentation is  24 if they have done something egregious, and I assume  25 that may be something like passing out drugs to the</p>	<p style="text-align: right;">Page 84</p> <p>1 <b>95 percent of the school is not being successful.</b>  2       <b>So looking at the data and looking at what had</b>  3 <b>happened at Whites Creek, all of the schools were</b>  4 <b>ranked. Whites Creek was last on the list out of all</b>  5 <b>of the schools. So that made me really look at, okay,</b>  6 <b>wait a minute, hold up, I don't want the State to come</b>  7 <b>and take this school.</b>  8       <b>Looking at the data of Whites Creek, Whites</b>  9 <b>Creek had not made gains in any of the areas for the</b>  10 <b>last three years, last three years. Whites Creek,</b>  11 <b>beautiful building, a school with a rich historical</b>  12 <b>narrative. Almost every single politician, people I</b>  13 <b>was meeting around the city was a Whites Creek alum.</b>  14 <b>I'm like, Absolutely not. The State is not going to</b>  15 <b>get this school. We've got to make some decisions,</b>  16 <b>and we've got to do something differently here or the</b>  17 <b>school {sic} is going to take this particular school.</b>  18       <b>Now, my role -- and you can go back and read my</b>  19 <b>story. I've had to exit nine principals in five</b>  20 <b>years. Four of the five, I hired myself. Because if</b>  21 <b>we don't close gaps -- the goal is for districts to</b>  22 <b>keep their schools, districts to support their own</b>  23 <b>schools. We don't need the State or anybody else</b>  24 <b>coming in to tell us how to do this work. We know how</b>  25 <b>to do it. But if we don't put an intervention in</b></p>

1 place, then the State looks at it as we didn't try to  
 2 fix our ills, and then they take schools.  
 3 **So Whites Creek was definitely a school that was**  
 4 **on the list to potentially be taken by the State, and**  
 5 **the only way -- and you can go back and read the whole**  
 6 **piece around priority schools. The only way schools**  
 7 **are not taken, you have to show different leadership.**  
 8 **Whites Creek had just hit -- I mean Maplewood in its**  
 9 **data -- the principal there was in her first year.**  
 10 **The data at Maplewood was also concerning, but the**  
 11 **principal was in the first year.**  
 12 **Looking at Whites Creek, the principal had been**  
 13 **there more than the three years. All of the data was**  
 14 **attached to that particular principal at that**  
 15 **particular school, and so if you don't make a decision**  
 16 **among leadership, then you risk losing a school and**  
 17 **all of -- everything else, the rich historical context**  
 18 **of that school, because if you go back and look at the**  
 19 **State, the State don't come in and run schools. They**  
 20 **partner with charters who come in and run the schools,**  
 21 **and so we could not risk that.**  
 22 **I was very open and honest and transparent, as I**  
 23 **am with you now, with the school and every school that**  
 24 **didn't have a new leader at the school that these are**  
 25 **potential schools where you are going to lose people.**

1 **And the school that had the longest running leadership**  
 2 **with the lowest data, ranked last in Metro, was Whites**  
 3 **Creek. It was --**  
 4 Q. Have you gotten rid of any other principals  
 5 since you have been at Metro?  
 6 **A. No, I was only there for 30 months.**  
 7 Q. Hold on. So the only principal that was gotten  
 8 rid of when you were at Metro was Dr. James Bailey.  
 9 Correct?  
 10 **A. Correct, correct, but we had conversations about**  
 11 **two more schools, but those principals left by choice.**  
 12 **We had conversations about --**  
 13 Q. Now --  
 14 **A. -- two more schools.**  
 15 Q. Now, do you recall calling Pippa Meriwether and  
 16 having a call with her after Dr. James Bailey was told  
 17 he had been removed from Whites Creek where you told  
 18 her, You know what he is going to say about this?  
 19 **A. No, I don't.**  
 20 Q. Do you recall that?  
 21 **A. I don't recall that, no.**  
 22 Q. Do you recall telling Dr. Pippa Meriwether, No,  
 23 Dr. Bailey is going to try to relate this back to the  
 24 fight with Coach Battle's brother?  
 25 **A. I didn't know about a fight with Coach Battle's**

1 **brother. So I don't know anything about that, no.**  
 2 Q. Okay. Did you talk at all to Dr. -- to the  
 3 executive director over Dr. Bailey, Renita Perry, to  
 4 ask her if she thought Dr. Bailey should be removed?  
 5 **A. Yes, I do recall talking to her, but I also**  
 6 **recall being very honest and transparent about the**  
 7 **data at the school. And I will say this: When I went**  
 8 **to the school, the culture and climate at the school**  
 9 **was wonderful, but the State does not base takeover on**  
 10 **the culture and climate of the school. It's based on**  
 11 **results.**  
 12 Q. Do you recall going into Whites Creek with  
 13 Renita Perry and sitting down with Dr. Bailey and  
 14 talking to him about how his school was doing?  
 15 **A. I do not, no.**  
 16 Q. Do you recall telling him sometime in the winter  
 17 of the 2019-2020 school year, the only time I believe  
 18 that you actually sat down with him, that his school  
 19 was doing fine and keep doing what he is doing? Do  
 20 you recall saying that?  
 21 **A. I don't recall saying that, but I do know that**  
 22 **most conversations that I have with principals --**  
 23 **again, looking over the data, you still have**  
 24 **day-to-day strategies to try to still close gaps. We**  
 25 **don't give up, period. So --**

1 Q. If Dr. Bailey were to testify that you came into  
 2 his school and sat down and told him he was doing a  
 3 fine job and to keep on doing what he is doing, would  
 4 you dispute that?  
 5 **A. I would not dispute that simply because what I**  
 6 **observed and what I held the ED accountable for,**  
 7 **Dr. Bailey was executing on that, but, again, when you**  
 8 **looked at the data over the three years, when**  
 9 **Dr. Bailey was exited, he was exited prior to the data**  
 10 **even coming out for the year that we personally**  
 11 **supported him; however, he received support for three**  
 12 **years prior to me being on the ground.**  
 13 **So the State doesn't care who was leading the**  
 14 **work. You've got the money, you got the funding, you**  
 15 **were supposed to move the needle. We receive grants**  
 16 **and funding to close gaps. If that doesn't happen,**  
 17 **decisions have to be made.**  
 18 Q. How long was Whites Creek on the priority school  
 19 list?  
 20 **A. How long?**  
 21 Q. Yes.  
 22 **A. It was over three years because the data went**  
 23 **back three years. So I don't have the data in front**  
 24 **of me. I've retired. So I don't have those files in**  
 25 **front of me, but it's documented.**

1 Q. And if he had not been on the priority list for  
 2 three years, would you have nonrenewed him, meaning if  
 3 he had been only been on the priority list for two  
 4 years or one year?  
 5 **A. Well, the State -- the State -- let me go back**  
 6 **to what I said at the beginning.**  
 7 **You are potentially at risk of losing your**  
 8 **school if you have received funding, you've been on**  
 9 **the list for three or more years and the improvement**  
 10 **is not evident. Then the State comes in and says, You**  
 11 **couldn't fix it; let us fix it.**  
 12 **So if you had been on the list one year or two**  
 13 **years, you are not a prime candidate for State**  
 14 **takeover. You are a prime candidate if you have been**  
 15 **on the list three or more years.**  
 16 Q. Okay. Now, hang on a second.  
 17 **A. Okay.**  
 18 Q. Is it fair that there were no -- the priority  
 19 status schools did not change for the 2019-2020 school  
 20 year?  
 21 **A. You said the priority status didn't change?**  
 22 Q. Yes, because there were no testing -- there was  
 23 no testing done of the school.  
 24 **A. Yes, because of COVID.**  
 25 Q. Yes.

1 **A. And we also had a tornado or something happened**  
 2 **that year as well. No, the State held us -- they held**  
 3 **us harmless that year.**  
 4 Q. Okay. So if you were on the priority list for  
 5 the 2019-2020 school year, that did not count against  
 6 you, did it?  
 7 **A. It didn't count with you getting off or on.**  
 8 Q. Okay. And so then if you had a school that was  
 9 priority in the 2019-2020 school year, that, if they  
 10 had been priority at the very end -- strike that.  
 11 If you had a school that was priority in the  
 12 2018-2019 school year, the priority status, number of  
 13 years it was priority stayed the same for the  
 14 2019-2020 school year. Correct?  
 15 **A. I think that's correct, yes, but remember now,**  
 16 **the year that the recommendation was made, we was**  
 17 **going on the three years prior to even '19-20. '19-20**  
 18 **data wasn't even in yet. So the score --**  
 19 Q. For the schools that was three or more years  
 20 priority at the end of the 2018-2019 school year, is  
 21 it correct that the State did not take over those  
 22 schools in the 2019-2020 school year?  
 23 **A. The State didn't take any schools, period, in**  
 24 **the whole state.**  
 25 Q. Okay.

1 **A. So remember now, it's not just being priority.**  
 2 **It's priority -- they look at the success and the**  
 3 **gains of students. The whole premise for giving**  
 4 **additional funding is to employ strategies to close**  
 5 **gaps.**  
 6 **If you look at the data and the gaps are not**  
 7 **closing, the State is saying, We're giving money,**  
 8 **strategies. You all are not doing what you said you**  
 9 **were going to do in the grants. Therefore, we're**  
 10 **going to come and do it. So it's not just being a**  
 11 **priority school. It's with closing gaps.**  
 12 Q. Did anyone in the State of Tennessee tell you  
 13 they were taking over Whites Creek?  
 14 **A. No, nobody told me that.**  
 15 Q. Now, I want to show you something that was  
 16 produced by Metro in this case.  
 17 **A. Okay.**  
 18 Q. We asked -- hang on.  
 19 **A. I need to cancel my appointment.**  
 20 Q. Let me show you this chart. We asked Metro to  
 21 provide us with a list of the schools that were on  
 22 priority status.  
 23 **A. Uh-huh.**  
 24 Q. And we asked them to -- let me find this. Hang  
 25 on.

1 **A. Okay. Yes, ma'am.**  
 2 Q. Let me find my Zoom here. It appears to have  
 3 disappeared.  
 4 Okay. There you are. Let me share this screen  
 5 with you.  
 6 **A. Okay.**  
 7 Q. Can you see this Excel spreadsheet?  
 8 **A. I can, yeah. Make it just a little bigger for**  
 9 **me if you can, if you can.**  
 10 Q. Make it bigger?  
 11 **A. Uh-huh, if you can, just a little bit.**  
 12 MS. HARBISON: At the bottom right-hand  
 13 corner, press the plus button.  
 14 BY MS. STEINER:  
 15 Q. Now, to begin with, let me go back to the very  
 16 bottom of the page so we can see if -- it doesn't have  
 17 a Bates stamp number on it. Let's go to the top of  
 18 the page. Can you see that, where it says the school  
 19 and it's got a list of the schools?  
 20 **A. (Nods head.)**  
 21 Q. And it says how long it has been priority?  
 22 **A. Uh-huh.**  
 23 Q. Okay. Can you -- we're going to go down, and do  
 24 you see how some say priority from 2018?  
 25 **A. Uh-huh.**



1 Q. Okay. And do you see where it's got -- let me  
2 find Whites Creek. Do you see Whites Creek?  
3 **A. I don't. I'm looking for it. Oh, right here,**  
4 **Whites Creek.**  
5 Q. Whites Creek High School, and it says it has  
6 been priority from 2018.  
7 **A. Uh-huh.**  
8 Q. Okay. If Whites Creek High School has been  
9 priority from 2018, would you agree that it's not --  
10 it was not in the three- to four-year priority status  
11 to get rid of the principal?  
12 **A. Well, the three-year priority status -- the**  
13 **three years prior to that would have been '18, '17 and**  
14 **'16. Right? So when it has from '18, I think they**  
15 **are getting the information saying they have been**  
16 **priority from '18. Nobody on the list has anything**  
17 **prior to -- I don't see a '17 anywhere on the list. I**  
18 **was trying to see if I saw it.**  
19 **So I don't think it's going to be a '17**  
20 **anywhere. They are telling you they are still**  
21 **priority from '18. They are still priority from '18.**  
22 Q. Let me show you another document. Okay? We're  
23 going to mark this one Exhibit Number 3.  
24 Okay. Excuse me, I believe it's Exhibit  
25 Number 2.

1 (Exhibit 2 was marked.)  
2 Q. And here is the one I really wanted to show you  
3 last time. I think I messed up.  
4 **A. Okay.**  
5 Q. Let me show you this one.  
6 Okay. Can you see this Excel spreadsheet that's  
7 got yellow on here?  
8 **A. I can.**  
9 Q. Okay. Does this list ones that have been  
10 priority from 2014?  
11 **A. I see '13 -- yeah, I see -- I think I see a few**  
12 **'13s up there, yeah.**  
13 Q. And if you scroll down here, you see quite a few  
14 there that say they have been priority from 2014, and  
15 then priority is improving.  
16 **A. Uh-huh.**  
17 Q. Okay. Do you see that?  
18 **A. Uh-huh.**  
19 Q. Okay. Napier, priority from 2014. Correct?  
20 **A. Uh-huh.**  
21 Q. Okay. And then you've got quite a few that have  
22 been priority from 2014. Correct?  
23 **A. Uh-huh.**  
24 Q. Do you see Whites Creek?  
25 **A. Uh-huh.**

1 Q. Okay. And do you see where that says it's been  
2 priority from 2018?  
3 **A. Uh-huh, but priority --**  
4 Q. Uh-huh. You see that, priority from 2018?  
5 **A. Uh-huh. What is in this block right here? I**  
6 **can't see it right there. J -- what's in J?**  
7 Q. What's what?  
8 **A. What's in J, cell J? I just see priority, but I**  
9 **don't see a year. J under Whites Creek.**  
10 Q. 2018, new priority calculations.  
11 **A. Uh-huh, still priority, uh-huh.**  
12 Q. That means in 2018 that Whites Creek, based on  
13 the information given to me by Metro Schools, became  
14 priority in 2018. Correct?  
15 **A. Not based on the data and the recommendation**  
16 **that I made, and I don't have that data.**  
17 Q. Based on what Metro Schools gave me --  
18 **A. Okay.**  
19 Q. -- it was priority beginning in 2018.  
20 **A. Gotcha. Well, that's not based on the data that**  
21 **I have and had actually from the State, because I even**  
22 **actually have the gaps that were calculated, actually**  
23 **gave -- I actually provided that to the superintendent**  
24 **as well.**  
25 Q. Okay.

1 **A. So that it wouldn't be any kind of -- again,**  
2 **this is based on facts and data. So I clearly have**  
3 **the data that shows where the school was actually --**  
4 **it's ranked last in the district. It was a potential**  
5 **for State takeover.**  
6 **I did nothing different based on the**  
7 **recommendation that I've done over the last 18 years**  
8 **of working with turnaround schools, wasn't the first**  
9 **principal that I have recommended. I did nine in**  
10 **Shelby County Schools, and I hired five -- four or**  
11 **five of the nine that was recommended that could not**  
12 **close the gaps because we didn't want to lose the**  
13 **schools.**  
14 Q. Dr. Griffin, did you at any point in time tell  
15 Dr. Bailey, I'm going to -- you run the risk of  
16 getting nonrenewed and losing your job at Metro  
17 Schools or getting removed from your job at Metro  
18 Schools because of the priority status of your school?  
19 **A. I did not. That wasn't my role to have a**  
20 **conversation -- I didn't have the conversations. One**  
21 **thing I did not do and have never done is I don't have**  
22 **conversations with principals about their jobs.**  
23 **That's what the executive director does. So HR --**  
24 **it's an HR --**  
25 Q. Did you know that Renita Perry never had a

1 conversation with Dr. Bailey to tell him that he  
 2 was -- stood the risk of losing his job at Metro  
 3 Schools --  
 4 **A. Well --**  
 5 Q. -- because of the status of the school?  
 6 **A. No, no, because HR can also have that**  
 7 **conversation as well. That's what I was saying to**  
 8 **you. It's HR --**  
 9 Q. Did you know nobody had that conversation with  
 10 James Bailey?  
 11 **A. Nobody had the conversation that he was at risk**  
 12 **of losing his job?**  
 13 Q. Yes. Nobody told Dr. Bailey that. The only  
 14 thing he heard was that he was doing a great job from  
 15 you.  
 16 **A. Right. The risk of losing his job was not --**  
 17 **the risk of losing his job was based on the years**  
 18 **being there and the school didn't improve after**  
 19 **receiving school improvement grant funds. So the**  
 20 **'19-20 data wouldn't have impacted yea or nay.**  
 21 Had we known they were not going to count the  
 22 data, had we known it was going to be whatever that  
 23 the State didn't do -- but the decision was made on  
 24 past performance. That's how districts are taken and  
 25 schools are taken by the State. It's on past

1 performance.  
 2 He was a principal that had been there for a  
 3 number of years, and all of the data, good or bad, was  
 4 connected to the leadership. So the data -- the  
 5 decision was based on '18, '17, '16.  
 6 Q. Okay. So then no part of his job performance  
 7 for the 2019 to 2020 school year entered into the  
 8 decision to remove him as principal for Whites -- from  
 9 Whites Creek. Correct?  
 10 **A. You said no part of his job?**  
 11 Q. Yes, the decision was based on the 2018-2019  
 12 school year.  
 13 **A. It wasn't based on one year. It was based on a**  
 14 **collective -- a collective performance. Right? So --**  
 15 Q. Ending in the 2019 school year. Correct?  
 16 **A. Ending in the 2019 school year? Is that what's**  
 17 **your question?**  
 18 Q. Yes.  
 19 **A. The decision was made based on the data and the**  
 20 **potential for the district to lose Whites Creek to the**  
 21 **State. The data, because we did not have any in**  
 22 **'19-20, we observed -- and I visited the school. Like**  
 23 **I said, the school was very -- culture and**  
 24 **climate-wise, band and all, culture and climate-wise**  
 25 **was great, but results matter. The results and the**

1 **data that was tied to Whites Creek was unacceptable.**  
 2 **It was not -- it was what the State -- an ingredient**  
 3 **for a State takeover.**  
 4 Q. Ms. Griffin, I'm going to ask you a couple of  
 5 questions here, and I would like yes/no answers.  
 6 Okay? There was no State scoring for the 2019-2020  
 7 school year at Whites Creek. Correct?  
 8 **A. No, there was no score. Yes, no scoring, yes,**  
 9 **no scoring.**  
 10 Q. Okay. And so those scores did not enter into  
 11 any decision to remove Dr. Bailey from Whites Creek.  
 12 Correct?  
 13 **A. Correct, but principals aren't removed for one**  
 14 **year of data, not in my recommendation.**  
 15 Q. Now, he was -- Dr. Bailey was removed based on  
 16 the data that had occurred up to the previous year,  
 17 meaning 2018-2019 or 2017-2018 or 2016-2017 school  
 18 years. Correct?  
 19 **A. The decision was made based on the years of**  
 20 **leadership from the current sitting principal for lack**  
 21 **of success at the school. Whatever those years**  
 22 **were -- because I don't have it in front of me. So I**  
 23 **don't want to call years.**  
 24 I like to be factual, which I have provided the  
 25 documentation to the district. It was based on the

1 **data, nothing to do with the principal's personality,**  
 2 **the culture. It was based on the data and the**  
 3 **school's lack of progression even though millions of**  
 4 **dollars was pumped into the school. So, I mean,**  
 5 **that's just a fact.**  
 6 Q. Dr. Griffin, my question is a little bit more  
 7 specific, because I think this is what you are trying  
 8 to say. I just want to make sure it's here on the  
 9 record. Okay?  
 10 The documentation that you used to justify  
 11 nonrenewing Dr. Bailey was documentation that had  
 12 accumulated before the 2019-2020 school year because  
 13 there were no scores in the 2019-2020 school year.  
 14 Correct?  
 15 **A. Yes, because the State uses previous -- they**  
 16 **wasn't going to use '19-20 to take the school.**  
 17 Q. Now, let me stop -- let me ask you a question.  
 18 You said you provided documentation to support your  
 19 decisions --  
 20 **A. Yes, I did.**  
 21 Q. And who did you send it to?  
 22 **A. Dr. Battle, because --**  
 23 Q. And did you send it by email?  
 24 **A. I may have given it to her in a one on one. We**  
 25 **met weekly. Every week we met.**

1 Q. So you may not have any documentation to support  
 2 this. You may have just told her orally?  
 3 **A. No, I provided a one pager.**  
 4 Q. And what did that one pager state on it?  
 5 **A. It documented the data to support what I had**  
 6 **observed and seen as it relates to the data.**  
 7 Q. And when did you provide this to Dr. Battle?  
 8 **A. It was during a one on one -- I'm not sure of**  
 9 **the date when Dr. Bailey found out, because it was**  
 10 **HR -- again, HR, I think, contacted him. So it had to**  
 11 **have been maybe in May maybe, late April, May.**  
 12 Q. Would you agree that -- so you had a one on one  
 13 with Dr. Battle about coach -- Dr. Bailey. Is that  
 14 correct?  
 15 **A. About all schools. We checked in weekly. When**  
 16 **we talked about the schools --**  
 17 Q. Were you aware of a nonrenewal list that was  
 18 kept at Metro Schools that would list the principals  
 19 and the teachers who were in danger of being  
 20 nonrenewed?  
 21 **A. No, I did not get that.**  
 22 Q. Did you know that one such list was kept at  
 23 Metro Schools up until the 2019-20 school year?  
 24 **A. Did not, no.**  
 25 Q. Did you know Dr. Bailey was never on that list?

1 **A. I don't know about a list. So I don't know that**  
 2 **he was on it. I did not see a list.**  
 3 Q. Did you know Dr. Battle had made statements to  
 4 the staff that her brother was fired because of Pippa  
 5 Meriwether, Dr. Bailey, --  
 6 **A. No.**  
 7 Q. -- Shawn Joseph, and Sara Portillo?  
 8 **A. No.**  
 9 Q. Did you know that HR had been told that  
 10 Dr. Bailey feared retaliation from Dr. Battle?  
 11 **A. No.**  
 12 Q. If someone who reports to you ultimately had  
 13 reported to HR that they were petrified their job was  
 14 going to be lost because Dr. Battle had taken over  
 15 Metro Schools, should that have been brought to your  
 16 attention?  
 17 **A. At least to the executive director, because,**  
 18 **again, I did not support principals directly. My role**  
 19 **was to supervise the executive director. So I would**  
 20 **think the executive director had that been brought**  
 21 **would have shared that with me.**  
 22 Q. Did anyone to your knowledge put in place any  
 23 safeguards to protect Dr. Bailey from retaliation?  
 24 **A. I didn't know he was any threat. So that's a**  
 25 **no. I didn't know there was a threat. I don't know**

1 **anything about this that happened. So, no.**  
 2 Q. Did anyone ask you at any point in time while  
 3 you were at Metro Schools why exactly of all of the  
 4 principals there did you remove the one who had  
 5 nonrenewed Dr. Battles' brother?  
 6 **A. No.**  
 7 Q. Would you agree that it is illegal to nonrenew  
 8 Dr. Bailey because he had to report both the illegal  
 9 beating up of a parent, the misuse of funds, and he  
 10 had to discipline Coach Battle?  
 11 **A. You said would I agree that it's --**  
 12 Q. Illegal.  
 13 **A. Oh, yes, it's illegal to use that to retal --**  
 14 **yes, I would agree that.**  
 15 Q. Did you know that after Dr. Bailey was  
 16 nonrenewed that Coach Battle requested to be brought  
 17 back at Metro Schools?  
 18 **A. No, I did not know that, no.**  
 19 Q. Did you have any conversations at all -- what  
 20 did Adrienne Battle state to you when you were having  
 21 the conversations about coach -- Dr. Bailey?  
 22 **A. The conversation about Dr. Bailey and his data?**  
 23 Q. About nonrenewing him. Let me stop a second.  
 24 What exactly happened to Dr. Bailey? Why is he  
 25 no longer at Metro Schools?

1 **A. Well, I'm going to share with you what I shared**  
 2 **with the conversation -- I'm going to go back to your**  
 3 **first question with Dr. Battle.**  
 4 **It was my role and part of my job description to**  
 5 **ensure that Metro Nashville Schools maintains full**  
 6 **control of all of their schools. We lose no schools**  
 7 **to the State, something I'm very proud of as a**  
 8 **superintendent, a regional superintendent. The State**  
 9 **has never taken a school under my leadership.**  
 10 **With that being said, I watched not only Whites**  
 11 **Creek but there are a couple other schools that I**  
 12 **brought to the table that in the '20-21 school year**  
 13 **was going to have the same potential consequences.**  
 14 **However, some of those principals or leaders are no**  
 15 **longer at the schools.**  
 16 **So the conversation was never about a person.**  
 17 **The conversation was about our students and the**  
 18 **remaining in full control under Metro, not the State,**  
 19 **not even talking about the leader. We're going to**  
 20 **lose this school. This is the data. This is what the**  
 21 **data says. In my experience and what has happened**  
 22 **over the years is we're going to lose this school if**  
 23 **we don't do something quickly.**  
 24 **So it was never about a person. Now, I was**  
 25 **never told about retaliation. I don't know anything**

1 about that. I kept the focus on the data, the schools  
2 and what I know to be real and true that the State has  
3 done and will do if no action is taken by a district  
4 and students are still not performing or the school is  
5 not being successful as it relates to the benchmark of  
6 what the State has identified. So it wasn't about the  
7 a person. It was about the students and the success  
8 of the school.

9 Q. Dr. Griffin, what happened to Dr. Bailey at  
10 Metro Schools? What happened to his job?

11 **A. Dr. Bailey -- Dr. Bailey was from my**  
12 **understanding -- and the HR decision was made based on**  
13 **the recommendation that the data from the years of**  
14 **leadership from the principal was not favorable, and**  
15 **the gaps were not closing. The school was at risk of**  
16 **potential takeover.**

17 Principals are the lead coaches at their  
18 schools. The same thing that would happen to a coach  
19 of a major team that people are pumping money into and  
20 you are not successful is the same thing that will  
21 happen to any of us if we're not successful in our  
22 jobs, especially the SOI. I don't know about Metro  
23 and any other place. I'm talking about schools of  
24 innovation.

25 Q. Let me try again. Let me try this question

1 again. Okay? What happened to Dr. Bailey's job at  
2 Metro Schools? Why is he no longer there?  
3 **A. He is no longer there because under his**  
4 **leadership the school and the gaps did not close, and**  
5 **the school --**

6 Q. Was Dr. Bailey --

7 **A. And the school was at risk of State takeover.**

8 Q. My question is -- I hate stopping you here, but  
9 you are off on a tangent here. Was Dr. Bailey fired?

10 **A. Well, when you are fired, I think you don't have**  
11 **an opportunity to have a job. Dr. Bailey had the**  
12 **opportunity to apply for other roles within the**  
13 **district. So I will not say fired, no.**

14 Q. Okay. And if he did not apply for other jobs,  
15 was he fired?

16 **A. That's a choice. You not applying for another**  
17 **job is not fired. That's not fired.**

18 Q. So if Dr. Bailey did not apply for any other  
19 jobs come June 30th, he did not have a job at Metro  
20 Schools. Correct?

21 **A. If he did not apply. That was a self-selected**  
22 **removal, though. If you did not apply, then you can't**  
23 **say I don't have a job if you did not apply.**

24 Q. So that's the same thing as somebody that  
25 doesn't work for Metro Schools. They have the right

1 to apply at Metro Schools. Correct?

2 **A. They do.**

3 Q. Okay. And if they don't apply, then that's just  
4 their fault. They just didn't apply.

5 **A. You made a conscious choice -- I ain't going to**  
6 **say your fault. You made a choice, because I hate to**  
7 **say fault. You made a conscious choice not to apply**  
8 **for a job, and what comes with that is you don't have**  
9 **a job.**

10 Q. Okay. Did you know -- I can't think of the name  
11 right now. Dr. Bailey was not transferred. Correct?

12 **A. Transferred?**

13 Q. Yes.

14 **A. No, not that I know of. Remember, my role, I**  
15 **can't hire anybody. I can't fire anybody. All I can**  
16 **do is make a recommendation to both. If someone**  
17 **chooses to be transferred, that's HR. As a chief of**  
18 **innovation, I can't hire or fire. Not a principal. I**  
19 **can only make a recommendation.**

20 Q. Okay. Did you recommend that Dr. Bailey be  
21 transferred into any other position?

22 **A. I cannot -- no, I did not.**

23 Q. Okay. Now, did you know that Dr. Battle  
24 testified that she made the decision to nonrenew  
25 Dr. Bailey based on performance? Did you know that?

1 **A. I don't -- how would I have known that?**

2 Q. Well, was that a true statement that Dr. Battle  
3 nonrenewed Dr. Bailey based on job performance?

4 **A. Well, I would say yes to that because if you**  
5 **look at the performance over the years under the**  
6 **leadership of the principal, then that's what the**  
7 **decision was made on. I don't know anything about the**  
8 **person.**

9 **Again, the performance of the school under the**  
10 **leadership of the principal is the recommendation that**  
11 **was made.**

12 Q. Okay. This priority school list that we've got  
13 up on the board, can we mark that Exhibit Number 3 for  
14 the court reporter.

15 **A. Okay.**

16 (Exhibit 3 was marked.)

17 MS. HARBISON: When you get to a stopping  
18 point, can we take a quick break?

19 MS. STEINER: Yes, we can.

20 BY MS. STEINER:

21 Q. Dr. Griffin, were you hired by Dr. Battle?

22 **A. I was hired by Dr. Battle.**

23 MS. STEINER: That's all. You want to take  
24 a break?

25 THE REPORTER: The witness was wanting to



1 take a break, too.  
 2 MS. STEINER: We'll take about a ten-minute  
 3 break.  
 4 (Short break.)  
 5 BY MS. STEINER:  
 6 Q. Now, are you ready?  
 7 **A. (Indicating thumbs up.)**  
 8 Q. Dr. Griffin, did you talk at all to Brook Fox?  
 9 **A. To who?**  
 10 Q. Brook Fox.  
 11 **A. No, I don't know who that is.**  
 12 Q. Okay. Now, before you got to Metro Schools, did  
 13 you know whether or not a Ms. Coons handled the  
 14 priority schools?  
 15 **A. She did, and I did, uh-huh. Lisa Coons handled**  
 16 **priority schools, that's correct.**  
 17 Q. And she was the associate superintendent. Is  
 18 that correct?  
 19 **A. Now, I'm not sure of her role, but she supported**  
 20 **the priority schools, very similar to what I'm doing.**  
 21 **So I don't know what her title was.**  
 22 Q. Okay. And tell me again the year that you got  
 23 at Metro Schools.  
 24 **A. I came July 1, 2019.**  
 25 Q. Okay. And so for the 2018 to 2019 school year,

1 Ms. Coons had the priority schools reporting to her?  
 2 **A. I don't know. I don't know if it was only**  
 3 **during that finite time, but I do know during all of**  
 4 **the previous grants that I had to review, she was the**  
 5 **person supporting them the year prior to me arriving.**  
 6 **So I don't know how long she was there.**  
 7 Q. And for the 2017-2018 school year, did you know  
 8 whether or not Ms. Coons was there, too?  
 9 **A. I don't, uh-uh.**  
 10 Q. Now, if Pippa Meriwether -- she was an associate  
 11 superintendent. Correct?  
 12 **A. Yes.**  
 13 Q. Okay. If Pippa Meriwether were to testify that  
 14 for the 2017-2018 school year Ms. Coons handled  
 15 priority schools, would you differ?  
 16 **A. I cannot agree or -- I mean, I don't know. So I**  
 17 **mean, Pippa has extensive historical knowledge of**  
 18 **Metro. So I can't say that.**  
 19 Q. Would you agree that Dr. Meriwether did not  
 20 handle priority schools?  
 21 **A. For '17-18 or '18-19?**  
 22 Q. Either one of those two years. She does not  
 23 have priority schools reporting to her. She never  
 24 did.  
 25 **A. I don't know that. '18-19, all of the**

1 **signatures that I observed was a Dr. Lisa, L-I-S-A,**  
 2 **Coons, C-O-O-N-S.**  
 3 Q. And did you see anything for the 2017-2018  
 4 school year, any documentation?  
 5 **A. I don't know -- recall seeing signatures or any**  
 6 **documentation.**  
 7 Q. Okay. And would that be -- for the 2018-2019  
 8 documents that you observed that had Ms. Coons'  
 9 signature on there, would that be the scores for the  
 10 school?  
 11 **A. We don't sign off on scores. All State**  
 12 **reporting and testing comes directly from the State.**  
 13 **So we don't sign off on scores. That directly comes**  
 14 **from TDOE, Tennessee Department of Ed.**  
 15 Q. So what were the documents that you were seeing  
 16 that Ms. Coons had signed off on?  
 17 **A. When we submit grants, we have to have our**  
 18 **signature along with the director of schools'**  
 19 **signature submitted to the State saying that the**  
 20 **information submitted has been properly reviewed and**  
 21 **we're all aware of what's inside of the documents.**  
 22 Q. Okay. Now, if Dr. Pippa Meri -- do you know  
 23 whether Dr. Pippa Meriwether was the associate  
 24 superintendent over Whites Creek for the 2017-2018  
 25 school year?

1 **A. Did you say did I know that?**  
 2 Q. Yes.  
 3 **A. I want to say Executive Director Perry because,**  
 4 **of course, we keep data based on evaluations, and**  
 5 **Executive Director Perry may have shared that she**  
 6 **supported the school or did the evaluation.**  
 7 Q. For the 2017-2018 school year?  
 8 **A. I think so. I'm not -- yeah, I think so.**  
 9 Q. Okay. And did you know that Dr. Meriwether did  
 10 not handle priority schools for the 2017-2018 school  
 11 year?  
 12 **A. I did not know -- like I said, I know '18-19,**  
 13 **because that's what I reviewed and was responsible for**  
 14 **ensuring that we executed for '19-20 for the grant**  
 15 **year. So I'm not -- no, I'm not aware of that --**  
 16 Q. Are you telling me that you do not know which  
 17 schools were priority for the 2017-2018 school year?  
 18 **A. I know the schools. You asked me who was the**  
 19 **person that supported them. From my understanding,**  
 20 **there was a lot of movement, you know, with the change**  
 21 **of the superintendent and all of that prior to me**  
 22 **getting there. I know the data. The State reports**  
 23 **the data. That's public knowledge. You can go**  
 24 **online, get the data and not even be a part of Metro.**  
 25 **But when you say a person responsible, I am not**

1 clear on who supported '17-18. I know that Lisa Coons  
2 signed documents for '18 because I had to go back and  
3 ensure that everything was implemented that was said  
4 to be implemented from the '18 school year in '19. So  
5 I know the data. I don't know who supported it.

6 Q. Okay. Did you know that Dr. Pippa Meriwether  
7 was associate superintendent over Whites Creek for the  
8 2017 to 2018 school year and that it was not a  
9 priority school?

10 **A. No.**

11 Q. If Dr. Meriwether testifies she was the  
12 associate superintendent in charge of Whites Creek  
13 from the 2017 to 2018 school year and it was not a  
14 priority school, would you differ from that? Would  
15 you contest that?

16 **A. I would have to say I don't know that for sure.  
17 So my answer would be I don't know for sure who  
18 supported Whites Creek --**

19 Q. Does the State of Tennessee keep track of the  
20 schools that are priority and not priority and list  
21 them online?

22 **A. They do keep track of the schools that are  
23 priority.**

24 Q. Well, let's pull up the 2017-2018 school year,  
25 and I want to discuss this with you, and I think

1 BY MS. STEINER:

2 Q. And, Dr. Griffin, do you see these schools that  
3 are listed in Davidson County?

4 **A. Uh-huh.**

5 Q. Are these the -- what were these --

6 **A. Reward. You can look at the far right column.  
7 It tells you.**

8 Q. Okay.

9 MS. STEINER: And, Ms. Harbison, could you  
10 go to the priority schools?

11 MS. HARBISON: Yes. So this is priority  
12 exit for the record is what I'm clicking on.

13 **THE WITNESS: Uh-huh.**

14 BY MS. STEINER:

15 Q. And what does that mean, Dr. Griffin, "priority  
16 exit"?

17 **A. They exited receiving support as a priority  
18 school. You can make double-digit gains in one year  
19 or be in the 15th percentile. Enough double-digit  
20 gains can mean -- priority exit means you are no  
21 longer on the priority school list or eligible for  
22 those school improvement grant dollars, or you can be  
23 in the 15th percentile, which is great as long as you  
24 can sustain that.**

25 **Remember, priority is bottom 5 percent. So if**

1 Ms. Harbison has this. She is going to share it with  
2 us.

3 **A. Okay.**

4 MS. STEINER: What do I need to do here?

5 MS. HARBISON: Ann, if you could just make  
6 me the host or share host with me, I can share my  
7 screen.

8 Ann, I think I shared my screen if y'all can see  
9 it.

10 MS. STEINER: Yes.

11 MS. HARBISON: And I'm going to scroll to  
12 the top, and you just let me know where you want me to  
13 go and I will.

14 MS. STEINER: Okay. Can you go to the 2017  
15 school year? That's which schools were the priority  
16 schools for that year.

17 MS. HARBISON: Yes. So when you click on  
18 each drop-down menu, you have to look at each  
19 drop-down menu individually. So I'll go through each  
20 one.

21 So these are the reward schools, and it's by  
22 county, just I'm pointing to Davidson County, and,  
23 Dr. Griffin, you just let me know when you're ready  
24 for me to keep scrolling.

25 **A. Uh-huh, I'm ready.**

1 **you move to the 15th percentile, they consider that as  
2 improvement.**

3 MS. HARBISON: For the record, I'm clicking  
4 on priority improving.

5 BY MS. STEINER:

6 Q. And, Dr. Griffin, priority improving, that shows  
7 two schools in Davidson County. Correct?

8 **A. Uh-huh, yeah, Inglewood, uh-huh.**

9 MS. STEINER: And then is there another  
10 list?

11 MS. HARBISON: There is focus exit and focus  
12 improving if you would like for me to click on either  
13 of those.

14 MS. STEINER: Yes.

15 **THE WITNESS: I don't see none in Davidson.**

16 BY MS. STEINER:

17 Q. You can also click on focus improving, and is it  
18 fair that in focus improving and focus exiting Whites  
19 Creek is not listed?

20 **A. I don't see it.**

21 MS. HARBISON: And that is the only data for  
22 2017 provided on the TDOE, Tennessee Department of  
23 Education, website.

24 **THE WITNESS: Uh-huh.**

25 MS. STEINER: Okay.

1 BY MS. STEINER:

2 Q. So, Dr. Griffin, would you agree that the  
3 Tennessee Department of Education website does not  
4 show Whites Creek as a priority school for the year?

5 **A. Where are the priority schools? I didn't see**  
6 **you click on priority schools. I see priority exit.**  
7 **I don't see a list of the priority schools. I see who**  
8 **exited. I see reward. I see priority and who is on**  
9 **there that improved.**

10 **Focus means one of the subgroups and gaps are**  
11 **closing. If you exit focus improving means those**  
12 **subgroups are improving. Where is the priority school**  
13 **list for 2017?**

14 MS. HARBISON: So can we go off the record  
15 just for a second?

16 MS. STEINER: Yes.

17 (Off the record.)

18 BY MS. STEINER:

19 Q. Dr. Griffin?

20 **A. Yes, ma'am.**

21 Q. Back on the record.

22 Dr. Griffin, did you know why -- can you tell me  
23 the exact date Whites Creek went on priority status?

24 **A. Without the records in front of me, I cannot.**

25 Q. Okay.

1 **A. I have since retired. I don't have that in**  
2 **front of me.**

3 Q. And if -- I think I have asked you this. I'm  
4 going to ask you this one more time and then move on  
5 to a different subject. If Dr. Meriwether were to  
6 testify that she was the associate superintendent over  
7 Whites Creek for the 2017 to 2018 school year and it  
8 was not in priority status, would you have any reason  
9 to differ from that?

10 **A. I don't know, like I said.**

11 Q. Okay.

12 **A. They -- when I came in 2019, they were part of**  
13 **our supported priority schools in looking at the data.**

14 Q. And you did not know how long they had been a  
15 priority school before you got there. Correct?

16 **A. Without the data in front of me. You have to**  
17 **have been a priority -- if you are receiving school**  
18 **improvement grant dollars, you are a priority school.**  
19 **They don't give funding if you haven't been dinged or**  
20 **identified as a priority school. We provide --**

21 Q. Dr. Griffin, you have no idea how long they were  
22 on priority status before you got there. Correct?

23 **A. Without the data in front of me. Now, I'm not**  
24 **going to let you say I don't have no idea, because I**  
25 **am retired, got this subpoena or whatever last week.**

1 **So without my data in front of me, I don't want to say**  
2 **I didn't have an idea, because the first thing I do is**  
3 **look at who and what I'm going to support and what**  
4 **would that support look like.**

5 Q. Now, did you know that Whites Creek did not have  
6 any math teachers except for one for the 2017 to 2018  
7 school year?

8 **A. I wasn't here in '17-18, but even if there is no**  
9 **math teacher in the school, as the school leader, it**  
10 **is my responsibility to ensure students are taught.**  
11 **If someone on your leadership team, if someone is a**  
12 **librarian, a counselor, has a math endorsement, we**  
13 **have to do everything we can as school leaders to**  
14 **ensure that our students are taught by a certified**  
15 **math teacher, and if that is the case, I should be**  
16 **making noise at every board member -- I mean board**  
17 **meeting that I don't have one. I was a principal. I**  
18 **did it.**

19 Q. Did you know that Whites Creek only had one math  
20 teacher and had five vacancies for the 20 -- in math  
21 for the 2017-2018 school year?

22 **A. I did not know that.**

23 Q. Would you agree that it is hard for children to  
24 pass their scores -- pass the testing if they don't  
25 have a math teacher?

1 **A. I do. Any teacher, not just math, yes.**

2 Q. Did you know that many of the kids at Whites  
3 Creek didn't even know how to use computers and the  
4 testing was done by computers?

5 **A. Uh-huh, that's a common issue in priority**  
6 **schools. That's a common challenge.**

7 Q. Did you know -- did you know -- let me show you  
8 this. I'm going to share a screen with you now again.  
9 I want to show you something. Let me see if I can get  
10 it here.

11 Okay. Can you see this document that's got the  
12 yellow, it's got red on here, it's got -- says, School  
13 Accountability Status? Can you see that?

14 **A. Yes, I can see it.**

15 Q. Do you see where it has the schools that I  
16 believe are the schools that are in priority status  
17 from about 2012 through the present date at Metro  
18 Schools?

19 **A. Yeah, I can see that.**

20 Q. And I want you to know that this is a document  
21 that was provided by the defendant to the plaintiffs  
22 in this case.

23 **A. Okay.**

24 Q. Okay. I want to ask you about this. Do you see  
25 Antioch Middle School? Right here it says it's

1 priority?  
 2 **A. I do.**  
 3 Q. Do you know when Antioch became priority?  
 4 **A. I don't know without my data in front of me.**  
 5 Q. Do you see where this list indicates that it  
 6 became priority in 2018?  
 7 **A. '18, I see it on there.**  
 8 Q. And do you see some of these schools -- it says  
 9 it's priority from 2012, like Bailey Middle School,  
 10 Brick Church Middle School, Buena Vista Elementary  
 11 Middle School?  
 12 **A. Uh-huh.**  
 13 Q. I assume that's what ES stands for. Correct?  
 14 **A. ES, elementary, yes, looking at this document.**  
 15 Q. Was it your knowledge that these schools,  
 16 Gra-Mar Middle School, were priority from 2012?  
 17 **A. I'm sure I looked at the lists in my documents**  
 18 **to see how long they have been in priority, but,**  
 19 **again, the school being on priority and the person**  
 20 **leading the school that took it into priority is also**  
 21 **a discussion and what the State uses as a deciding**  
 22 **factor, even though a school may have been on the**  
 23 **priority list for ten years, from 2012 to 2022, which**  
 24 **is highly unlikely without some kind of intervention,**  
 25 **you also look at the number of years even if the**

1 **school is not priority.**  
 2 **If the school goes into priority in 2018 and**  
 3 **I've been the principal there since 2014, I took it**  
 4 **into priority. And so the State looks at what has**  
 5 **happened to the school that there is a school leader**  
 6 **and the school has gone into priority.**  
 7 **So we're not just talking about schools being in**  
 8 **priority. We're talking about how long has a leader**  
 9 **been at a school that's in priority and was a leader**  
 10 **there when a school went into priority, or are they**  
 11 **still there while the school is in priority.**  
 12 **So I think you really have to understand and**  
 13 **know how the data is calculated and the role that the**  
 14 **State plays with ensuring that every student gets the**  
 15 **necessary support with a school leader that can**  
 16 **provide that according to the data. I'm not saying**  
 17 **that a school leader can't, but if the data reflects**  
 18 **that you have been there, then --**  
 19 Q. All of these schools that were in priority when  
 20 you were there, you were the --  
 21 **A. Chief of innovation for 2018-19, yes.**  
 22 Q. Were you the chief of innovation over Antioch  
 23 Middle School?  
 24 **A. Antioch Middle School, yes.**  
 25 Q. Okay. And let's look at Antioch Middle School.

1 From this list, do you see Antioch that's on Line 6?  
 2 **A. I can -- can you make it a little bigger for me,**  
 3 **Ms. Steiner, a little bit bigger? I can see it, but**  
 4 **it's awfully small from the way we're looking.**  
 5 **Okay, that's better. Line 6. I see just --**  
 6 Q. Do you see Whites Creek? And do you see where  
 7 Whites Creek here on this list, too, is listed as  
 8 going into priority under Line I, which means --  
 9 **A. What year?**  
 10 Q. 2018.  
 11 **A. 2018. But let me say to you what I said to you**  
 12 **previously. A school being in priority, yes, what**  
 13 **we're talking about, but when the school went into**  
 14 **priority, was the same principal there. The State**  
 15 **looks at the school is in priority, how long has the**  
 16 **principal been there? Did the school go into priority**  
 17 **while the principal was there, or, I mean, I think we**  
 18 **can't just say Whites Creek didn't become a priority**  
 19 **until 2018. How long was the principal there when it**  
 20 **went into priority? All of that is taken into**  
 21 **account.**  
 22 Q. Dr. Griffin, the same procedure follows whether  
 23 it's middle school, grade school, elementary  
 24 school, --  
 25 **A. It does.**

1 Q. -- or high school?  
 2 **A. It does.**  
 3 Q. So look at Antioch Middle. Antioch, it's on  
 4 Line 6. You see that?  
 5 **A. Uh-huh.**  
 6 Q. Okay. Let's scroll across here. Do you see  
 7 Line 6? It became priority at the same time as Whites  
 8 Creek in 2018. Do you see that?  
 9 **A. Yes, I do.**  
 10 Q. Okay. And it's priority from 2018 and 2019.  
 11 2020, no test administered. Let's look at the  
 12 principal.  
 13 **A. Okay.**  
 14 Q. Cecelia Conley, 2015.  
 15 **A. Okay.**  
 16 Q. Correct? Cecelia Conley, 2016.  
 17 **A. Uh-huh.**  
 18 Q. Cecelia Conley, 2017. Cecelia Conley, 2018.  
 19 **A. Uh-huh.**  
 20 Q. And Cecelia Conley, 2019. Do you see that?  
 21 **A. Uh-huh.**  
 22 Q. Okay. And did you see she is not there in 2020?  
 23 **A. I do see that on your chart. I do.**  
 24 Q. Okay. And so she was on -- she was principal of  
 25 a priority school for three years. Correct?



1 **A. According to this chart. Now, she was principal**  
2 **for me one year, 2019.**

3 Q. Okay. Same thing, Dr. Bailey was principal for  
4 you for one year, 2019. Correct?

5 **A. Correct. So I'm trying to hear your connection**  
6 **here.**

7 Q. So what happened to Ms. Conley in the 2020 year?  
8 Did she lose her job, too?

9 **A. I'm not sure -- oh, she became an executive**  
10 **director.**

11 Q. She was promoted?

12 **A. I don't know if you call it a promotion, because**  
13 **I didn't hire her or promote her, but --**

14 Q. So she became an executive director, and you  
15 don't know whether or not that was a promotion?

16 **A. Well, that was -- she was no longer a building**  
17 **principal. She became an executive director.**

18 Q. And is that lower or higher than principal  
19 position?

20 **A. It's a principal supervisor.**

21 Q. Okay. So it's a higher position, isn't it?

22 **A. Uh-huh. It's a higher -- it's a principal**  
23 **supervisor.**

24 Q. Okay. And who made the decision -- you were on  
25 the scoring for those interviews. Can you tell me who

1 made the decision to promote Cecelia Conley from being  
2 a principal of a priority school to being an executive  
3 director?

4 **A. Well, the process for all executive directors**  
5 **was to interview. Those of us who interviewed scored**  
6 **and we hit send to the HR team. So those people**  
7 **selected was decided after the scores were calculated.**  
8 **So I was not in the room to select anybody except my**  
9 **three people that I was responsible for.**

10 Q. Can you tell me whether or not you went to  
11 Cecelia Conley and told her she was losing her job at  
12 Metro Schools because she's in a priority school role?

13 **A. I did not.**

14 Q. Do you know whether or not Chris Barnes did  
15 that?

16 **A. I don't know.**

17 Q. Can you tell me any reason why Ms. Conley was  
18 told -- was not told she was losing her job because  
19 she was a principal of a priority school for over  
20 three years?

21 **A. Again, being a principal at a priority school**  
22 **for over three years does not cause you to lose your**  
23 **job. When you look at the data, being a principal at**  
24 **a school has to do with the success or the closing of**  
25 **gaps of student achievement.**

1 **If students are not being successful and you are**  
2 **not closing gaps, then you are a potential candidate**  
3 **to lose your job for State takeover.**

4 **Whites Creek was -- as we originally I thought**  
5 **we was talking about -- was ranked last in the entire**  
6 **district. You can look at the rankings. Principal**  
7 **had been there over three years --**

8 Q. Wasn't Antioch -- had Antioch Middle School been  
9 a priority school for over three years?

10 **A. I don't have the data in front of me, but even**  
11 **if they were not a priority school for three years, if**  
12 **the principal has been there three or more years, you**  
13 **are a potential candidate for State takeover if you**  
14 **have been there three or more years.**

15 Q. Okay. Assuming that this document that Metro  
16 gave us is accurate, can you see where Antioch Middle  
17 School was priority 2018, 2019 --

18 **A. Uh-huh.**

19 Q. Okay. Is it because that it was only priority  
20 for the 2018-2019 school year that Ms. Conley was not  
21 let go?

22 **A. But your length of time as a priority school is**  
23 **not the only factor. Has the school made gains? Has**  
24 **the school been successful? Are gaps being closed?**  
25 **Yes, if a principal has been at a school three**

1 **or more years and it was priority one year, then you**  
2 **have a risk of being reassigned, let go, whatever is**  
3 **deemed as a decision for no longer being the principal**  
4 **at the school. It's up to you to apply for whatever**  
5 **it is that you want to apply for.**

6 **I'm saying that to say -- I want to make it**  
7 **clear and on the record -- being a priority school**  
8 **does not mean you are going to lose your job for three**  
9 **years. Being at a priority school and the school is**  
10 **not making gains, the school is not being successful,**  
11 **the school's ranking is last in the district, all of**  
12 **these factors are things that the State is looking at**  
13 **when they make a decision on if they take a school or**  
14 **not. It's not just because it's been there for three**  
15 **or more years.**

16 Q. So now, Dr. Griffin, let me correct you then.  
17 It seems like to me earlier you testified that you  
18 look to see whether or not a school had been priority  
19 for more than three years, and it sounds like now  
20 you're saying it doesn't matter. You may be priority  
21 less than three years. Is that what you are saying?

22 **A. What I'm saying to you is any school that**  
23 **started with me on 2019-20, I was a chief of**  
24 **innovation, which means I was responsible for**  
25 **supporting any school that was in priority status.**

1 So I know for a fact without -- I've been  
2 retired since January 7. I don't have documents in  
3 front of me. I don't even have access to an old email  
4 when I was at MNPS.

5 So starting July 1 of 2019, every school that I  
6 supported was in priority status. So I know July 1 of  
7 2019, because I had support -- I was supporting the  
8 school. Whatever -- I don't know what they were in  
9 '17-18, but I supported them in 2019.

10 What I'm saying to you is if a school is in  
11 priority status, if a school's principal has been at  
12 the school three or more years and the school is  
13 regressing, you are at risk of not being the principal  
14 at that school. That's just a fact. You are at risk.

15 And I'd rather for Metro to do an intervention  
16 than the State to take the school because when the  
17 State takes the school, they have a right to make it a  
18 charter school or whatever else they deem, and those  
19 are resources that are pulled from the district.

20 Q. Okay.

21 A. So let me be clear on that.

22 Q. Dr. Griffin, excuse me. Sometimes your image is  
23 freezing up. So I don't know when you stop speaking  
24 and when you haven't. So just kind of -- if I  
25 interrupt you, let me know, and I apologize for that.

1 Okay. Now, earlier you testified that the State  
2 will take you over if you are in priority status more  
3 than three years and you have the same principal.  
4 Correct?

5 A. Without the school being successful. If you  
6 have been the principal at a school for three or more  
7 years and you are not closing gaps, you can't -- you  
8 are at risk. I'm not going to say they are going to  
9 take the school, but you are at risk.

10 Q. Dr. Griffin, Dr. Griffin, okay, you testified  
11 that you need to be in priority status for more than  
12 three years -- it's one of the factors -- more than  
13 three years with the same principal, correct, before  
14 the State will take you over?

15 A. Let me say this to you.

16 Q. Is that not true?

17 A. Okay. So let me say this. If you are --

18 Q. Is that true, Dr. Griffin, or is that not true?

19 A. The truth is if you have been the principal at  
20 that school -- because the State is going to look at  
21 is the school being successful with this school  
22 leader. If the school is not being successful with  
23 the school leader, you are not -- you are at risk of  
24 the school being taken over and the principal has been  
25 there for three years.

1 So it's not just priority status. It's also if  
2 the principal has been there and not being successful.

3 Q. Dr. Griffin, Dr. Griffin, --

4 A. Yes.

5 Q. -- my question to you is very simple.

6 A. Okay.

7 Q. Very simple. And I would like a yes/no  
8 response.

9 A. It doesn't require a yes/no response.

10 Q. This does.

11 A. Okay. Well, let me hear your question.

12 Q. Earlier you testified under oath that the State  
13 looks at whether or not a school has been in priority  
14 status for three or more years --

15 A. Okay.

16 Q. -- with the same principal.

17 A. Okay.

18 Q. Is that true?

19 A. Okay. Let me explain to you --

20 Q. Is that true?

21 A. Even if a school -- let me explain to you --  
(Simultaneous discussion.)

22 THE REPORTER: I can't get both of y'all  
23 talking at the same time, and it's hanging up for some  
24 reason, so y'all are going to have to just wait.

1 THE WITNESS: Okay.

2 THE REPORTER: Sorry.

3 Okay, go.

4 A. Okay, let me explain to you how data -- because,  
5 see, you can't just look at this chart and think you  
6 understand data.

7 When you look at data at a school, if a school  
8 is in priority status, one year -- let me just start  
9 with one year, and then we'll go on to three. If they  
10 are in priority status for one year, one year, but the  
11 principal has been at that school three, four, five  
12 years, and they just made it on the list 2018 and you  
13 have been there since 2014, then what the State looks  
14 at is what has this principal been doing, done, what  
15 supports have been put in place, and they still move  
16 to priority status.

17 So if you have been at a school and your school  
18 goes into priority status, whether they was priority  
19 or not for three years, then you are at risk of State  
20 takeover. You have been at the school more than three  
21 years. That's the magic number here, three. Data is  
22 run every three years at the State, and that's how  
23 they make decisions, every three years.

24 Now, being at priority status for three years  
25 with the same principal and no improvement, yeah, you

1 **are at risk of State takeover.**  
 2 BY MS. STEINER:  
 3 Q. Now --  
 4 **A. Without my list in front of me -- I don't have a**  
 5 **list in front of me. I'm retired. I retired happily**  
 6 **January 7th. So I don't have a list in front of me.**  
 7 **So I'm looking at your data, and I'm telling you what**  
 8 **I know and what I lived for the last 15 years is if a**  
 9 **school moves in priority status and you've been a**  
 10 **principal there five years, whether they are on there**  
 11 **one year or not, you are the principal that moved them**  
 12 **into priority status, and the State looks at that as a**  
 13 **deciding factor. Yes, they do. Who's the principal?**  
 14 **How long the principal been there?**  
 15 (Simultaneous discussion.)  
 16 BY MS. STEINER:  
 17 Q. Let's look at some of these other schools.  
 18 **A. Okay. We can look at them.**  
 19 Q. Let's look at Brick Church Middle School.  
 20 **A. Brick Church has already been taken over by the**  
 21 **State. That's why. They've been taken over already**  
 22 **by the State. That's a State school. Brick Church is**  
 23 **a State school.**  
 24 Q. Hang on a second. Let's look at --  
 25 **A. Neely's Bend taken over by the State. So the**

1 **State will take schools.**  
 2 Q. Okay. So Neely's Bend was taken over, and what  
 3 else has been taken over?  
 4 **A. Brick Church.**  
 5 Q. Okay.  
 6 THE REPORTER: Are you going to make this an  
 7 exhibit? Are you going to make this an exhibit?  
 8 MS. STEINER: Yes.  
 9 THE REPORTER: Okay, thank you, because all  
 10 these names, I don't know them.  
 11 BY MS. STEINER:  
 12 Q. Let me ask you this. Okay. Do you see  
 13 McKissack?  
 14 **A. McKissack, uh-huh.**  
 15 Q. Line 8. Has that been taken over by the State?  
 16 **A. It has not. And McKissack was a school in**  
 17 **conversation.**  
 18 Q. Based on this list, it's been priority since  
 19 2018. Correct? Do you see that?  
 20 **A. I do see that, uh-huh.**  
 21 Q. And do you see where Darren Kennedy was the  
 22 principal in 2015?  
 23 **A. At what school? Okay.**  
 24 Q. McKissack.  
 25 **A. I do see that.**

1 Q. Do you know who Darren Kennedy is by any chance?  
 2 **A. I don't.**  
 3 Q. Do you see in 2016, 2017, 2018 Thomas Chappelle  
 4 was the principal?  
 5 **A. Uh-huh.**  
 6 Q. Okay. And it went into, by this chart, priority  
 7 status --  
 8 (Zoom malfunction).  
 9 Q. It went into priority status in 2018, McKissack,  
 10 correct, from this chart? And Thomas Chappelle  
 11 continued to be the principal through the end of the  
 12 2020 school year. He was there a year after  
 13 Dr. Bailey. Correct?  
 14 **A. Uh-huh.**  
 15 Q. Is that a yes? When you say "uh-huh" --  
 16 **A. I'm looking at -- yes, I'm looking at your**  
 17 **chart, and he was there.**  
 18 Q. And Thomas Chappelle was not removed as  
 19 principal from McKissack. Correct? In fact, you let  
 20 him stay there, didn't you?  
 21 **A. I don't let principals stay, because I can't**  
 22 **hire or release a principal. So letting him stay**  
 23 **there is not the question. Looking at the rankings,**  
 24 **looking at the rankings of schools, is also a factor.**  
 25 **Whites Creek High School was ranked last in the**

1 **entire district. So being a person that worked at the**  
 2 **State with priority schools even prior to coming to**  
 3 **Metro, that is a factor that is looked at. So you**  
 4 **can't just say being a priority school or a**  
 5 **principal -- all of the rankings, all of that matters**  
 6 **when you're talking about taking over a school. All**  
 7 **of that matters.**  
 8 **So you can't come in and say that's one -- it's**  
 9 **not -- this is a complex process that involves**  
 10 **qualitative as well as quantitative data.**  
 11 Q. Do you know whether or not any of these other  
 12 principals engaged in any sort of actions that --  
 13 (Zoom malfunction) -- Dr. Bailey in getting rid of  
 14 Coach Battle?  
 15 **A. You are going out, Ms. Steiner. You are going**  
 16 **to have to ask your question again. Your connection.**  
 17 Q. Do you know whether or not any of these other  
 18 principals at any of the schools listed here engaged  
 19 in any activity that had anything to do with Coach  
 20 Battle losing his job?  
 21 (Zoom malfunction.)  
 22 (Off the record.)  
 23 BY MS. STEINER:  
 24 Q. Who was the principal at Brick Church when you  
 25 left Metro Schools?

1 **A. Brick Church is an achievement school district**  
 2 **school. I didn't have them. The State had already**  
 3 **taken them over. We don't support State takeover**  
 4 **schools. That's strictly the State.**

5 Q. Okay. So then does it look like these schools  
 6 that are in red, are these the schools that the State  
 7 has taken over?

8 **A. I'm not going to say schools that the State have**  
 9 **taken over, but I will tell you that an intervention**  
 10 **has been done in Metro's level so that they wouldn't**  
 11 **lose them to the State.**

12 **Like I'm looking at -- if you go back over to**  
 13 **the left, scroll over to the names of schools instead**  
 14 **of principals, scroll back over to the left all the**  
 15 **way over. I can tell you interventions were made at**  
 16 **these particular schools, because Robert Lilliard**  
 17 **closed. Let me see what other one. That school**  
 18 **closed, was in priority status.**

19 **I can't see the names of the schools. Move over**  
 20 **just a little bit. I can tell you that Joelton Middle**  
 21 **School closed. The Cohn Learning Center closed since**  
 22 **I was there. Looking at the data, Gra-Mar Middle**  
 23 **School closed -- well, it actually merged with another**  
 24 **school -- but closed as part of them not being able**  
 25 **to -- Buena Vista closed.**

1 **So even since I have been on the ground, there**  
 2 **is an intervention that happened at the schools to try**  
 3 **to ensure that Metro retains and keeps schools that**  
 4 **have been on the list for a number of years.**

5 Q. What's going on with Whites Creek when you left  
 6 there?

7 **A. In January?**

8 Q. Yes.

9 **A. There was a new principal hired at Whites Creek**  
 10 **in '20.**

11 Q. And how did he do?

12 **A. How did he do? I need more.**

13 Q. At Whites Creek.

14 **A. How did he do the first year? I mean, I need**  
 15 **more from you.**

16 Q. Yeah, how did he do the first year at Whites  
 17 Creek?

18 **A. He did -- I mean, as far as it relates to**  
 19 **performance, according to his executive director and**  
 20 **my visits at the school, it was a great first year.**

21 Q. Did you know Sonia Stewart by any chance?

22 **A. I did not know her personally because she wasn't**  
 23 **in the role as a principal when I came to Metro. So I**  
 24 **did not know her personally.**

25 Q. Okay. Did you know that she was the principal

1 at -- where was this; hang on a second -- at  
 2 Pearl-Cohn?

3 **A. I did know she was principal at Pearl-Cohn. I**  
 4 **actually had a conversation with her, and we talked**  
 5 **about some turnaround work, and she told me she was**  
 6 **the former principal at Pearl-Cohn.**

7 Q. And did you know that had been a priority  
 8 school?

9 **A. Yes, from our conversation, yes. I'm sure I saw**  
 10 **a list of all the schools, but from our conversation,**  
 11 **definitely, she was Pearl-Cohn.**

12 Q. And did you know it had been priority since  
 13 2014?

14 **A. I don't have my data in front of me. So I**  
 15 **didn't know how long it had been priority.**

16 Q. And did you know that Sonia Stewart became an  
 17 executive officer?

18 **A. I would not have known that. Was that prior to?**  
 19 **I know she was in HR my year. She worked in HR. I**  
 20 **met her in HR. So I'm not sure about the role prior**  
 21 **to that.**

22 Q. Okay. Do you know Sonya Brooks who was Gra-Mar?

23 **A. Sonya Brooks I met as the principal of Maplewood**  
 24 **High School. That's when I met her.**

25 Q. Did you know she was at Gra-Mar, a priority

1 school, before she became the principal at Maplewood?

2 **A. Yes, the executive director, Renita Perry, I**  
 3 **think, Professional Development supported that school.**

4 Q. And do you see Gra-Mar on this list that had  
 5 been priority since 2012?

6 **A. I do see that.**

7 Q. Okay. And do you see -- but it was your  
 8 understanding that Ms. Brooks, Sonya Brooks, was  
 9 promoted from principal of Gra-Mar, which was a  
 10 priority school, to principal of Maplewood?

11 **A. Now, in the sense of promotion, I don't know if**  
 12 **I would use from middle to high school as a major**  
 13 **promotion other than the number of students I think**  
 14 **you get paid differently. So it was still a school**  
 15 **leader role.**

16 Q. Okay.

17 **A. And, again, she was selected prior to me coming.**  
 18 **She was already the principal. When I got here**  
 19 **July 1, 2019, she was the principal, already selected.**

20 Q. Okay. Now, since you have been at Metro  
 21 Schools, has the State taken over any school?

22 **A. They haven't taken over any schools, not even in**  
 23 **the state, period. They've actually been in some**  
 24 **transition themselves.**

25 Q. And when you say they've been in transition



1 themselves, what do you mean?  
 2 **A. Consistent leadership. I actually worked at the**  
 3 **State for a year prior to coming to Metro Nashville**  
 4 **Public Schools, and so there has been a lot of**  
 5 **transition at the State with people even being able to**  
 6 **track appropriate data and make sure and ensure that**  
 7 **consistent messages happen.**

8 **So no -- and then, of course, with the COVID,**  
 9 **with the pandemic, you know, things around the**  
 10 **priority status have changed. I know there has been**  
 11 **some governor types of mandates and things happening**  
 12 **as it relates to priority schools, and now they even**  
 13 **said where the achievement school district will no**  
 14 **longer exist after June 30th, at least for direct run**  
 15 **schools.**

16 Q. So does that mean that there is going to be less  
 17 priority schools?

18 **A. Oh, no, the problem and issues -- that's just**  
 19 **the name that happened in the priority space will**  
 20 **continue. We need the resources, necessary resources,**  
 21 **to ensure that we can put those resources in front of**  
 22 **kids and make sure our teachers receive and school**  
 23 **leaders receive the appropriate support. So the -- go**  
 24 **ahead.**

25 Q. Will the chance of a school taking over -- the

1 State taking over a school because it's a priority  
 2 status, have those decreased?

3 **A. I'm not sure what your question is asking. Are**  
 4 **you asking has the number of schools that the State is**  
 5 **taking over -- is it less than when they first**  
 6 **started?**

7 Q. With all the changes going on at the State, is  
 8 there less likelihood now that the State will take  
 9 over a school?

10 **A. I would not say that, because the State writes**  
 11 **the rules, and they change them as they see fit. So**  
 12 **if they so desire to change it just like they did in**  
 13 **any other case, then they will -- I don't have faith**  
 14 **that they won't, absolutely not.**

15 Q. Is Whites Creek -- was Whites Creek in priority  
 16 status in 2021?

17 **A. I haven't seen -- I don't know if they are in**  
 18 **priority status now. The State is actually rewriting**  
 19 **how they will calculate, since there was no data.**  
 20 **Remember there was no data in 2020. So the State is**  
 21 **looking at -- usually there is a three-year cycle of**  
 22 **data, and they look at how the school has performed or**  
 23 **not for the past three years. That's the magic**  
 24 **number, three.**

25 **Since we did not have any data in 2020, the**

1 **State has to now rethink how would that support be**  
 2 **provided, how would they continue to ensure that**  
 3 **school improvement grant funds and dollars can get to**  
 4 **the schools identified because those resources are**  
 5 **deployed based on your status.**

6 **And so right now, things are kind of -- they had**  
 7 **an ASD superintendent position posted. Now they are**  
 8 **saying they are not hiring. So they don't even have**  
 9 **anybody leading the priority work right now because**  
 10 **it's just in limbo right now.**

11 **And so with that being said, hopefully the**  
 12 **school improvement grant process will continue because**  
 13 **our schools need them. They need the funding to**  
 14 **support the schools. So right now, being away from**  
 15 **the work, I'm not sure where it is right now.**

16 Q. But the departments at the State that oversees  
 17 priority schools is in limbo right now?

18 **A. They are in limbo. Absolutely they are. They**  
 19 **are in limbo.**

20 Q. Now --

21 **A. They don't even have a priority school leader.**

22 Q. And has it been in this limbo since COVID hit?

23 **A. Well, actually, the job posting has gone up two**  
 24 **or three times since COVID. They had some candidates**  
 25 **identified for the role, and then they all of a sudden**

1 **said they are going in a different direction. They no**  
 2 **longer are going to be filling this position. So --**

3 Q. Let's try this again. Has the State Department  
 4 been in limbo since COVID hit in 2020?

5 **A. I would say yes, in my personal opinion, yes.**

6 Q. Okay. And that's the year 2019-2020 when there  
 7 was no data. Correct?

8 **A. That's the year where we did not test due to**  
 9 **COVID across the entire state.**

10 Q. Okay. Can we break for just about five minutes?  
 11 And, Dr. Griffin, I think that's going to be -- I'm  
 12 getting close to the end, you'll be happy to hear.

13 Is that the okay with the court reporter?

14 THE REPORTER: Sure.

15 (Short break.)

16 BY MS. STEINER:

17 Q. Dr. Griffin?

18 **A. Yes, ma'am.**

19 Q. Do you believe that you need to be honest with  
 20 the principals who work under you as to the reason why  
 21 they have been removed from their job?

22 **A. Do I need to be honest with them?**

23 Q. Yes, as to the reason why.

24 **A. Absolutely. Honesty and transparency is one of**  
 25 **my core values and virtues, yes.**

1 Q. Meaning that if you remove someone because they  
2 are in a danger of being taken over by the State, you  
3 would tell the principal that, You are being removed  
4 because the school is in danger of being taken over by  
5 the State. Correct?

6 **A. Correct.**

7 Q. Okay. Now, I want to show you this exhibit  
8 here.

9 THE REPORTER: Excuse me, the last one that  
10 you had up, were we marking that one as Number 3 or --

11 MS. STEINER: 3. This will be 4.  
12 (Exhibit 4 was marked.)

13 BY MS. STEINER:

14 Q. Can you see this, Dr. Griffin?

15 **A. Uh-huh, I do.**

16 Q. Did you tell Dr. Battle -- did you discuss with  
17 Dr. Battle the reason why James Bailey was losing his  
18 job -- (Zoom malfunction.)

19 **A. Well, I can't talk to the superintendent about  
20 somebody losing a job. I talked about the data and my  
21 thoughts around what was going to happen next. So my  
22 recommendation was if we don't make a change and  
23 intervene quickly, we are at risk of losing his  
24 school.**

25 **So I didn't tell the superintendent how to make**

1 **a decision. What I said was we're at risk of losing  
2 this school due to the data and the ranking and what  
3 has happened at Whites Creek for the last three years.**

4 Q. Okay. And let's -- let me show you this letter.  
5 It's dated May 4th, 2020, and it is to Dr. Bailey from  
6 Dr. Battle. Do you see that?

7 **A. I do.**

8 Q. Okay. Can you read the first paragraph?

9 **A. Uh-huh. (Witness complies.)**

10 Q. Okay. Did Dr. Bailey lose his job at Whites  
11 Creek because of the district's reorganization?

12 **A. I don't know why he lost his job, but I can tell  
13 you the recommendation that I made was due to the data  
14 at the school, my experience with the State having  
15 worked for the State, the ranking of the school, we're  
16 at risk of losing this school to the State.**

17 **So as to why he lost the job, I can't tell you  
18 why. I can tell you my recommendation and what I  
19 provided.**

20 Q. Would you agree that this letter does not have  
21 your reasons that you testified to today under oath in  
22 it?

23 **A. I could say a budget impact is losing the  
24 school. You don't get the funding, and the BEP does  
25 not go to Metro Nashville if you lose the school. So**

1 **budget impact could be actually justified under losing  
2 the school because there's a tremendous budget impact  
3 that happens when you lose a school to the State.**

4 Q. What's the tremendous budget impact?

5 **A. All of the BEP dollars follow the kids. So when  
6 the State authorizes, whether it's a charter or a  
7 direct run, all of that funding goes directly to  
8 whoever they authorize to run that school.**

9 Q. And is it the same amount that the school would  
10 have gotten if it had not been taken over?

11 **A. Well, the BEP formally is the same, but in my  
12 experience, as you look at charter management  
13 organizations and their philanthropic relationships  
14 across the state, there is normally more money  
15 funneled in because they also qualify now for the SIG  
16 dollars.**

17 **So it's the same amount of money as it relates  
18 to BEP, but there is almost always an additional fiscal  
19 realignment based on their relationships with  
20 philanthropic partners.**

21 Q. So then if it's not taken over by the State,  
22 Metro Schools ends up with more money?

23 **A. No, Metro Schools doesn't end up with more  
24 money, but they keep what they have and can continue  
25 the intervention. Our main goal is to fix and**

1 **sustain -- because our kids are not broken. We want  
2 to fix the systems or whatever has caused the gaps to  
3 exist. Nothing wrong with the kids. We've seen that.**

4 Q. Dr. Griffin, this letter to Dr. Bailey does not  
5 mention anything about becoming -- that it's a  
6 priority school and that it hasn't risen out of that  
7 status and that the State is going to take it over,  
8 does it?

9 **A. It does not, but budget impact is a direct  
10 result.**

11 Q. Did you at any point tell Dr. Bailey, You are  
12 being removed because you are in a priority school and  
13 there is a danger the State is going to take over?  
14 Did you tell Dr. Bailey?

15 **A. That wasn't my role to do. That wasn't my role.**

16 Q. Do you know of anybody that told Dr. Bailey  
17 that?

18 **A. I don't know of anyone that told him. I  
19 communicated it to my supervisor.**

20 Q. Okay. Now, if you were in a conversation where  
21 that was not told to Dr. Bailey, would you have had a  
22 job duty for correcting it to make sure that  
23 Dr. Bailey understood why he was losing his job at  
24 Whites Creek?

25 **A. Well, that's HR's responsibility. So, no, I**

1 don't hire. I don't fire. It is not my role or  
 2 responsibility. That's an HR responsibility. So  
 3 absolutely not. That's not my role.  
 4 Q. So if HR leaves out in their discussion with  
 5 Dr. Bailey that he is losing his job because it's a  
 6 priority school and the State is going to take it over  
 7 and you are sitting there and you hear HR leave all  
 8 that out, would you at any point say, Wait a minute, I  
 9 think this man needs to know why he is being removed?  
 10 A. Well, the budget impact in this letter clearly,  
 11 to me, could be that same conversation, I'm sure,  
 12 prior to that. I was not in a conversation with HR  
 13 outside of him receiving --I don't even know. I don't  
 14 know if this letter was mailed. I don't know if this  
 15 letter was given in person. I don't know how he even  
 16 received the letter. So, you know, not being my  
 17 responsibility --  
 18 Q. So you were not in any conversations?  
 19 A. Yes, I was in a conversation. Actually, we was  
 20 on a Zoom call, myself and Dr. Bailey along with the  
 21 HR representative.  
 22 Q. Okay. And did you know it was taped?  
 23 A. I don't know if it was taped or not. I don't  
 24 know. I don't remember, like in this conversation,  
 25 being told that it was taped. So if it was taped, it

1 was against my approval.  
 2 Q. Did you recall -- do you recall that nowhere in  
 3 that conversation did it come up that the State was  
 4 going to take over Whites Creek?  
 5 A. I don't recall, no, I don't.  
 6 Q. Do you recall whether or not the term "priority  
 7 school" was not even mentioned in that phone call?  
 8 A. I don't recall. No, I don't recall.  
 9 Q. Okay. Do you think the term "priority school"  
 10 should have been mentioned when the discussion was had  
 11 with Dr. Bailey?  
 12 A. Well, I think that the justification for removal  
 13 of a principal in my experience -- as I did in this  
 14 same case -- and you can check the record -- was to  
 15 prevent the intervention of State takeover, and the  
 16 tenure of this leader at this school while the school  
 17 is in priority is clearly -- is clearly cause for some  
 18 type of action to take place.  
 19 The State is going to come -- has the potential  
 20 to come after this school. The data said it. The  
 21 ranking said it. The school was ranked last in the  
 22 entire district. The principal had been there over  
 23 three years, and so knowing what I know about the  
 24 State, being a 28-year veteran, 29-year veteran at the  
 25 time, my role and my responsibility is to protect the

1 district, to protect our kids and ensure I communicate  
 2 this, because I don't want a district to lose kids.  
 3 I've never lost a school on my watch, and I want  
 4 to make sure we are providing the best stable and  
 5 sustainable intervention for our kids if that's what's  
 6 needed.  
 7 So if there is anything that needs to be done  
 8 and we can do it on the front end versus a State  
 9 takeover -- because we saw their intervention fail,  
 10 so, of course, I did not want to see that happen.  
 11 So all I'm saying to you, Ms. Steiner, is, like  
 12 I'm saying it to you over and over and over, it was  
 13 clearly communicated over, over and over.  
 14 Q. Okay. Now, Dr. Griffin, Ms. Conley, who was  
 15 principal of a priority school, do you have any  
 16 knowledge of whether or not she made any decision or  
 17 testified against Coach Battle?  
 18 A. Coach Battle, the superintendent's brother?  
 19 Q. Yes, Adrienne Battle's brother.  
 20 A. No, I don't know anything about that situation  
 21 at all. No, I do not.  
 22 Q. Okay. And if you did know about that situation,  
 23 would you have gone in and talked to anyone at HR  
 24 about possible retaliation in terms of removing James  
 25 Bailey as principal of Whites Creek just a week after

1 Adrienne Battle takes over as director of school, and  
 2 Dr. Bailey is the only one who recommended -- (Zoom  
 3 malfunction) -- had the ability to recommended that  
 4 the coach -- who had the ability to recommend that  
 5 Coach Battle be removed? You can't hear me?  
 6 A. (Indicating.)  
 7 Q. Okay. Let's stop the share. Can you hear me  
 8 now?  
 9 A. Better, yes. We can hear you better.  
 10 Can you ask your question again, please? Can  
 11 you ask your question? We couldn't hear the question.  
 12 Q. Be patient for just a second and I will.  
 13 A. Oh.  
 14 Q. Did any of the principals who reported to you  
 15 engage in any activity that you thought was protected  
 16 under federal or state law?  
 17 A. Did they engage in any activities that was  
 18 protected?  
 19 Q. Yes.  
 20 A. You mean illegal activity or --  
 21 Q. No, I mean like maybe they claim that they are  
 22 being retaliated against because they reported the  
 23 coach beating up a parent or the coach  
 24 misappropriating funds or they reported racial  
 25 discrimination in the school system? Did you know of

1 anyone that reported to you who had engaged in any  
 2 protected activity?  
 3 **A. We think we heard most of what you said, anyone**  
 4 **engaged in any reported activity. No, that was**  
 5 **retaliated against, no.**  
 6 Q. Okay. When you talked to Dr. Battle about James  
 7 Bailey, did she make any comment -- was anyone else  
 8 present in that conversation?  
 9 **A. We had one on ones every week. So I always**  
 10 **updated her about school. So it was just the two of**  
 11 **us in that conversation.**  
 12 Q. And other than Dr. Bailey, there has been no  
 13 other principal or assistant principal you removed for  
 14 job performance?  
 15 **A. No.**  
 16 MS. STEINER: Okay. That's all.  
 17 **THE WITNESS: That's the end?**  
 18 MS. HARBISON: Almost. No, no, don't get up  
 19 quite yet, Dr. Griffin. Do you need a break?  
 20 **THE WITNESS: No, uh-uh, I want to keep**  
 21 **going.**  
 22 EXAMINATION  
 23 BY MS. HARBISON:  
 24 Q. Okay. Dr. Griffin, my name is Jesse Harbison,  
 25 and I represent Dr. Damon Cathey in this case, who I

1 think you said that you know. Correct?  
 2 **A. Yes.**  
 3 Q. Was that a yes?  
 4 **A. Yes.**  
 5 Q. Okay. And if at any point I'm freezing up, you  
 6 just raise your hand. Okay?  
 7 **A. Okay.**  
 8 Q. Because it's really important that you hear my  
 9 questions and understand them. Okay? So we will  
 10 figure this out. I don't know if y'all -- maybe the  
 11 court reporter needs to move their computer or  
 12 something, but we will figure it out.  
 13 I have just a few questions for you. I promise.  
 14 I'm going to share my screen with you.  
 15 Dr. Griffin, can you see my screen?  
 16 **A. (Indicating thumbs up.)**  
 17 Q. That was a yes. Correct?  
 18 **A. Yes.**  
 19 Q. Okay. I'm going to show you some documents now.  
 20 I think we have established earlier that you were on  
 21 the interview panel or you were supposed to be on the  
 22 interview panel for the executive director interviews  
 23 in Spring 2020. Correct?  
 24 **A. Yes.**  
 25 Q. Okay. I'm going to show you some calendar

1 invitations or what I believe are calendar  
 2 invitations. Okay?  
 3 **A. Okay.**  
 4 Q. So this first one, take a look at this, and  
 5 after you have had a chance to review it, let me know  
 6 if you have seen this document before.  
 7 **A. I mean, I see my name.**  
 8 Q. Let me ask it this way: To me, this appears to  
 9 be a calendar invite for June 4th, 2020 for Executive  
 10 Director - Schools Interview. That's the subject. Do  
 11 you see that?  
 12 **A. I do. I do see that.**  
 13 Q. Okay. And do you see that you are one of the  
 14 required attendees?  
 15 **A. I do, yes.**  
 16 Q. And do you see that Chad High is also a required  
 17 attendee?  
 18 **A. Okay, I do.**  
 19 Q. Okay. And are all the other required attendees  
 20 individuals that were involved in the hiring process  
 21 for the executive director job in 2020?  
 22 **A. Yes, I guess, yeah.**  
 23 Q. Okay.  
 24 **A. What I remember, yes.**  
 25 Q. Okay. So does this appear to be a calendar

1 invite for Chad High's interview for the executive  
 2 director job based on that information?  
 3 **A. Well, I don't know it's a calendar invite,**  
 4 **because my calendar invites didn't look like this. It**  
 5 **was -- you know, it was an invite like yes or no. I**  
 6 **don't remember -- like this person has already**  
 7 **accepted it. So my invites didn't look like -- it**  
 8 **says, Meeting status accepted.**  
 9 **So whoever this is at the top, I guess, Stark,**  
 10 **had already accepted it. So that's accepted. I don't**  
 11 **know what the original --**  
 12 Q. Do you know who Kenneth Stark is?  
 13 **A. I do. I remember Ken.**  
 14 Q. You know Ken Stark?  
 15 **A. I remember Ken.**  
 16 Q. Okay. And this has a subject, a location, a  
 17 start time, and an end time. Correct?  
 18 **A. Uh-huh, it does.**  
 19 Q. Does it appear to be anything other than a  
 20 calendar event for an event that is to take place  
 21 called Executive Director - Schools Interview?  
 22 **A. It appears to be, yes.**  
 23 Q. For Chad High. Correct?  
 24 **A. Well, the person -- I see his name on there. So**  
 25 **I would think yes.**



1 Q. Are any of the other individuals that are  
 2 required attendees individuals that applied for the  
 3 job of executive director in 2020 that you remember?  
 4 **A. Not that I remember, no.**  
 5 Q. Okay. So does that help you to refresh your  
 6 recollection about what this document might be?  
 7 **A. Well, it would help me more -- do you have one**  
 8 **accepted from me? Since you've got one from Ken, do**  
 9 **you have one accepted from me? Because I don't want**  
 10 **to say yes to that question. I want to be as factual**  
 11 **as possible under oath here, so I would like to see an**  
 12 **accepted from me. I don't see -- I see from him, but,**  
 13 **you know, I don't know -- I just want to be --**  
 14 Q. Okay. Dr. Griffin, let me ask it a different  
 15 way. Okay? I'm not asking if this was a calendar  
 16 invite that was accepted from you.  
 17 **A. Okay.**  
 18 Q. I'm asking does this appear to be a calendar  
 19 invite that you were invited to for an Executive  
 20 Director - Schools Interview?  
 21 **A. It looks like a Microsoft Teams meeting for an**  
 22 **executive director interview, yes. The answer is yes.**  
 23 Q. For Chad High. Correct?  
 24 **A. Chad High is on there, yes.**  
 25 Q. Okay. And that the interview was on, it appears

1 based on this, June 4th, 2020 at 8:15 a.m. Correct?  
 2 **A. That's what it looks like. That's what I --**  
 3 **yes.**  
 4 Q. We've got a couple of these to go through. So  
 5 let's just try to do this as quickly as we can. Okay?  
 6 **A. Okay.**  
 7 Q. So I'm going to go to the next -- do you see at  
 8 the bottom it says Microsoft Teams?  
 9 **A. I do.**  
 10 Q. Okay.  
 11 **A. Yes.**  
 12 Q. Let's go to the next one. Okay? I'm going to  
 13 try to run through these as quickly as I can. So if  
 14 you can just listen to the question, answer the  
 15 question that's asked. Okay?  
 16 Does this appear to be a calendar event for an  
 17 Executive Director - Schools Interview for May 20th,  
 18 2020, Dr. Griffin?  
 19 **A. Yes.**  
 20 Q. Okay. And under required attendees, is Carl  
 21 Carter one of the individuals who interviewed for the  
 22 job?  
 23 **A. Yes, Carl Carter interviewed for executive**  
 24 **director job, yes.**  
 25 Q. Okay. So does this appear to be a calendar

1 event for Carl Carter's interview for executive  
 2 director --  
 3 **A. It does. It does appear to be a calendar event.**  
 4 Q. May 20th -- on May 20th, 2020. Correct?  
 5 **A. Yes.**  
 6 Q. Okay. Let's move on to the next one. Same  
 7 question, does this appear to be a calendar event for  
 8 Renita Perry for May 20, 2020 for the Executive  
 9 Director - Schools Interview?  
 10 **A. Yes, Renita Perry.**  
 11 Q. Great. Okay. Next page, does this appear to be  
 12 a calendar invite for the Executive Director - Schools  
 13 Interview for Robin Shumate for May 20th, 2020?  
 14 **A. Yes.**  
 15 Q. Great. Next page. Is this a calendar invite  
 16 for the executive -- or calendar event for the  
 17 Executive Director - Schools Interview for Schunn  
 18 Turner for May 20th, 2020?  
 19 **A. Yes, appears to be.**  
 20 Q. Next page, is this a calendar event for  
 21 Executive Director - Schools Interview for David  
 22 Kovach for May 20th, 2020?  
 23 **A. Yes, seems to be, David Kovach.**  
 24 Q. Next page, is this a Schools Interview calendar  
 25 event for the executive director position for Sonia

1 Stewart for May 20, 2020?  
 2 **A. Yes.**  
 3 Q. Okay. Next page, is this a calendar event for  
 4 Executive Director - Schools Interview for Craig  
 5 Hammond for May 21st, 2020?  
 6 **A. It appears to be, yes.**  
 7 Q. I'll do this going forward, and for the ones  
 8 that we've already gone over, you are a required  
 9 attendee, correct, on this calendar event?  
 10 **A. Organizer, required attendees, I see my name,**  
 11 **yes.**  
 12 Q. Okay. Great. Next page, and this is -- and I  
 13 will go back and identify these for the record as  
 14 well. This is marked Plaintiff 467. Is this a  
 15 calendar event for May 21st, 2020 for the Executive  
 16 Director - Schools Interview for -- well, this one  
 17 doesn't have a list of attendees. So we can skip this  
 18 one.  
 19 The next page is Plaintiff 468. Is this an  
 20 Executive Director - School MNPS Interview calendar  
 21 event for May 21st, 2020?  
 22 **A. May 21st, required attendees, see my name, yes,**  
 23 **yes, I see my -- yes.**  
 24 Q. Okay. Are you a required attendee of this  
 25 event?

1 **A. Yes, I see that, yes.**

2 Q. Okay. This says the last required attendee is  
3 FEversonTuggle@outlook.com. Is that Felicia Everson  
4 Tuggle to your knowledge?

5 **A. Yes.**

6 Q. Okay. And that page is marked Plaintiff 468 for  
7 the record.

8 Next page, I'm going to ask you a question about  
9 this email. This will sort of help break it up a  
10 little bit.

11 **A. Okay.**

12 Q. Do you see this next document? It is Bates  
13 stamped. Okay, Dr. Griffin, when lawyers use the word  
14 "Bates stamp," it's just a number at the bottom of the  
15 page. Okay? So for the record, this is Bates stamped  
16 Plaintiff 469. Do you see that?

17 **A. I do.**

18 Q. Okay. Take a second and look at this document,  
19 and after you have had a chance to look at it, let me  
20 know that you have had a chance to review it.

21 **A. Okay.**

22 **Uh-huh, I see it.**

23 Q. Okay. Have you seen this document before?

24 **A. I'm retired. That was in 2020. I can't -- I**  
25 **mean, it's got my email on it. So I'm sure I saw it.**

1 **I don't -- I mean, for all honesty, I can't -- I had**

2 **had surgery. So I don't know. I mean, I'm sure I**  
3 **did.**

4 Q. Well, let me ask you a question about that.  
5 When you say you had "head surgery," did that affect  
6 your memory?

7 **A. Oh, no, uh-uh. I can remember, but I'm retired.**  
8 **So does that affect my memory? I haven't been looking**  
9 **at emails since June 7th from Metro. So I just want**  
10 **to make sure, you know, as I'm looking at this, you**  
11 **know, I'm doing my due diligence to under oath tell**  
12 **exactly what I remember and what I don't, as we**  
13 **should.**

14 Q. When you say you had "head surgery" though, was  
15 it brain surgery?

16 **A. It's confidential. I'm not going to disclose my**  
17 **medical records. I'm just saying that to say this was**  
18 **a year ago. Okay? And -- two years ago actually,**  
19 **2020.**

20 **So I'm looking at this -- when you say have you**  
21 **seen this before, it's an email. You know, I checked**  
22 **my emails every day when I was at Metro. So, you**  
23 **know, I want to be real clear and say yes, I have seen**  
24 **it. My name is on it.**

25 Q. I just want to make sure I'm understanding. I'm

1 not trying to be insensitive at all. When I asked you  
2 if you remembered this, you said you had "head  
3 surgery."

4 **A. Uh-huh.**

5 Q. So I just want to make sure that -- I'm  
6 wondering why you brought that up when I asked you if  
7 you remembered this.

8 **A. Well, I brought that up because it's been two**  
9 **years ago. It's been two years ago. You said have I**  
10 **seen this? Do I remember it? I'm saying to you, as I**  
11 **started this whole conversation off, I was out because**  
12 **of a health-related condition. I was on FMLA since**  
13 **October. I had surgery. Right?**

14 **And so when you say specifically word for word**  
15 **on an email, that's very different from me recalling**  
16 **work that I lived. I lived turnaround work for the**  
17 **last 15 years. Right? But you telling me that I see**  
18 **a document, have received this document, my name is on**  
19 **the email, and, again, I'm sure I've seen the**  
20 **document, you know, but unlike turnaround work that**  
21 **I've done for years and years and years that I lived,**  
22 **this document was June 3rd, 2020. So I'm sure I have**  
23 **seen it, but I'm just letting you know that it's been**  
24 **two years. For somebody who didn't have surgery, I'm**  
25 **sure they might say, I don't know about -- two years**

1 ago?

2 **So I'm just saying to you when you framed it,**  
3 **you have seen this actual document, you know, you are**  
4 **the first person that is showing me ten documents in a**  
5 **row and saying did I see it, does it look like a**  
6 **calendar invite? I've just been seeing data, you**  
7 **know, that I can clearly recall, because, like I say,**  
8 **I lived the work. I didn't just do the work. I lived**  
9 **it.**

10 Q. Let me make sure I understand what you said, and  
11 then we can move on, because I really don't want to  
12 get into this that's not relevant.

13 Did you say you had surgery or you had head  
14 surgery? Did you just say you had surgery?

15 **A. I had surgery. I had. I had surgery. I had**  
16 **surgery in October. In October, I had surgery.**

17 Q. Okay. I misheard you, but for the record, just  
18 to make sure that we're clear, you brought that up  
19 when I asked if you recalled this, but your surgery  
20 did not affect your memory. Correct?

21 **A. No.**

22 Q. And then we can move on.

23 **A. It did not. But when you talk about a two-year**  
24 **memory going back to two years ago, if I ask you**  
25 **something June 3rd two years ago -- you know, I'm on**

1 the email. I just want to make a record. I want it  
2 to be documented that, you know, for the record, this  
3 was two years ago. You're saying did I specifically  
4 see this email. I'm on the email. So I'm sure I saw  
5 it, you know --

6 Q. Okay. It will take -- so what you can do,  
7 Dr. Griffin, I think, to help us move it along just a  
8 little bit is you are perfectly welcome to -- if I  
9 say, Do you recall seeing this email, you can say, I  
10 don't remember. That's --

11 A. Okay.

12 Q. Yeah. But is your email on here as a  
13 recipient --

14 A. My name is, and I want to be real clear. There  
15 is two Sharon Griffins in Metro Nashville Public  
16 Schools, and I had to make it clear sometimes that if  
17 they did not put a 2 in my email address -- it's two  
18 Sharon Griffins.

19 So I'm going to say my name is on this email,  
20 but I don't remember seeing it specifically. It's not  
21 an email that I would have etched in my brain to  
22 remember, but, I mean ...

23 Q. Who is the other Sharon Griffin?

24 A. I don't know the other Sharon Griffin. It's  
25 two, though. You'll have to get that from Metro.

1 Q. Okay.

2 A. I just know I had a 2 in my email, and if you  
3 left the 2 out, it went to that other person.

4 Q. Okay.

5 A. I can tell you that.

6 Q. This is from Lisa Spencer. Correct?

7 A. Uh-huh.

8 Q. On June 3rd, 2020. Correct?

9 A. Correct.

10 Q. Okay. And this is Chad High's résumé. Correct?

11 A. I can't see the link. I see the attachment says  
12 that's what it is, but what's actually attached, I  
13 can't see. I see a link.

14 Q. And are the other recipients of this email the  
15 individuals who were on the interview panel for the  
16 executive director interviews?

17 A. Yes.

18 Q. Just for the record, the subject says, For High  
19 interview. Correct?

20 A. It does. I can see that, yes, ma'am.

21 Q. And the attachment says, Chad High résumé?  
22 Correct?

23 A. It does.

24 Q. Okay. Let's move on.

25 Is this next page, which is Bates stamped

1 Plaintiff 470 -- is this a calendar event for  
2 Executive Director - Schools Interview for Steve Ball  
3 for May 1st, 2020?

4 A. Yes.

5 Q. And are you a required attendee?

6 A. Uh-huh, my name is on there.

7 Q. Okay. The next page which is Bates stamped

8 Plaintiff 471, is this an Executive Director - Schools

9 Interview calendar event for James Witty for May 21st,  
10 2020?

11 A. Yes, I see that.

12 Q. And are you a required attendee?

13 A. I see my name.

14 Q. Okay. Under required attendees?

15 A. Yes.

16 Q. Okay. Next page, Plaintiff 472, is this an  
17 Executive Director - Schools Interview event for  
18 May 21st, 2020? This one is also for James Witty. So  
19 we can move on to the next page.

20 Plaintiff 473, is this a calendar event for  
21 Executive Director - Schools Interview for May 22nd,  
22 2020 for Brenda Diaz?

23 A. Brenda Diaz, yes.

24 Q. Are you a required attendee?

25 A. Yes, my name is on that.

1 Q. Okay. Next page, Bates labeled Plaintiff 474,  
2 is this a calendar invite for Executive Director -  
3 Schools Interview for May 22nd, 2020, for Barbara, who  
4 I think goes by Michelle, Maultsby-Springer?

5 A. Yes.

6 Q. And are you a required --

7 A. Yep.

8 Q. Okay. Next page -- and we're getting close to

9 the end. Okay? Is this an Executive Director -

10 Schools Interview calendar event for May 22nd, 2020  
11 for Lily Leffler?

12 A. Yes. And I see my name on there.

13 Q. Are you a required attendee?

14 A. Yes, I see my name on there.

15 Q. All right. So based on this, then

16 Dr. Leffler -- you would have interviewed Dr. Leffler  
17 most likely on May 22nd, 2020. Correct?

18 A. Yes.

19 Q. Okay. Next page, which is Bates stamped

20 Plaintiff 476, is this an Executive Director - Schools

21 Interview calendar invite for May 22nd, 2020 for Karen  
22 DeSouza Gallman?

23 A. Yes.

24 Q. Okay. And are you a required attendee?

25 A. Yes.

1 Q. Okay. Next page, which is Bates stamped  
2 Plaintiff -- is this an invite for Executive Director  
3 - Schools Interview for Chaerea Snorten -- 477, Bates  
4 477 -- is this an Executive Director - Schools  
5 Interview calendar invite for Chaerea Snorten --

6 **A. Yes, looks to be.**

7 Q. -- for May 26, 2020?

8 **A. Yes.**

9 MS. HARBISON: And for the court reporter,  
10 that first name is spelled C-H-A-E-R-E-A. Last name  
11 is spelled S-N-O-R-T-E-N.

12 THE REPORTER: Thank you.

13 BY MS. HARBISON:

14 Q. Are you a required attendee?

15 **A. Yes.**

16 Q. Okay. Next page, Plaintiff 478, is this an  
17 Executive Director - Schools Interview calendar event  
18 for May 26th, 2020 for Lendozia Edwards?

19 **A. Yes.**

20 Q. Are you a required attendee?

21 **A. Required attendee, yes.**

22 Q. Next page, Plaintiff 479, is this an Executive  
23 Director - Schools Interview calendar event for  
24 May 26th, 2020 for Pippa Meriwether?

25 **A. Yes, I see Pippa's name, yes.**

1 Q. Are you a required attendee?

2 **A. Yes.**

3 Q. Okay. So based on this, would you most likely  
4 have interviewed Dr. Meriwether on May 26th?

5 **A. May 26th, yes.**

6 Q. Okay. Next page, which is Plaintiff 480 -- we  
7 only have a few of these left, I promise -- is this a  
8 calendar invite for Executive Director - Schools  
9 Interview for May 26, 2020 for Celia Conley?

10 **A. Yes.**

11 Q. Okay. And are you a required attendee?

12 **A. Yes.**

13 Q. Okay. Next page, which is Plaintiff 481, is  
14 this an Executive Director - Schools Interview  
15 calendar event for Marie Feagins for May 27th, 2020?

16 **A. Yes.**

17 Q. And are you a required attendee?

18 **A. Yes, on here.**

19 Q. Okay. Next page, which is Bates labeled  
20 Plaintiff 482, is this an Executive Director - Schools  
21 Interview calendar invite for May 27th, 2020 for  
22 Martin McGreal?

23 **A. Yes.**

24 Q. Are you a required attendee?

25 **A. Yes.**

1 Q. Okay. Next, and second to last, is this an  
2 executive director calendar event for Executive  
3 Director - Schools Interview -- let me start that  
4 over.

5 Is this a calendar event for Executive Director  
6 - Schools Interview for May 27th, 2020 for Dr. Ron  
7 Woodard?

8 **A. Dr. Ron Woodard? Yes, I see that, yes.**

9 Q. Okay. Are you a required attendee?

10 **A. Yes.**

11 Q. Okay. And then last page, is this an Executive  
12 Director - Schools Interview calendar invite for  
13 May 29th, 2020 for Shawn Lawrence?

14 **A. Yes, I see that. Shawn Lawrence.**

15 Q. And are you a required attendee?

16 **A. Yes, I see my name.**

17 Q. Okay. And that's Plaintiff 484.

18 So I'm going to offer this as a collective  
19 exhibit, Plaintiff 459 through Plaintiff 484. I'm not  
20 sure what number we're on.

21 I'm going to stop my screen for a second.

22 (Exhibit 5 was marked.)

23 BY MS. HARBISON:

24 Q. So based on the documents that we just reviewed,  
25 Dr. Griffin, it looks like -- and I can show them to

1 you again -- that most of the interviews took place  
2 during the last couple of weeks of May of 2020.

3 Correct?

4 **A. Yes.**

5 Q. Okay.

6 **A. Starting with May 20th, yeah.**

7 Q. Starting with May 20th?

8 **A. Uh-huh, yeah.**

9 Q. And Chad High was interviewed on June 4th.  
10 Correct?

11 **A. I don't know his date. Let me see. Is that  
12 what your date said?**

13 Q. I'll share my screen again.

14 **A. Yeah. Let me see. I didn't put that date. Let  
15 me see. chad High.**

16 Q. It's okay. I'll show you my screen.

17 **A. Oh, okay, I see it now. I'll put that down.**

18 **Okay.**

19 Q. So based on this, it appears that Chad High was  
20 interviewed on June 4th. Correct?

21 **A. Looking at this calendar invite, it says,  
22 Schools Interview, yeah.**

23 Q. Do you have any reason to doubt that that's  
24 accurate?

25 **A. At this point, no.**



1 Q. Okay. Based on the calendar invites that we  
2 just went through for the Executive Director - Schools  
3 Interview, did Metro have a -- prior to June 4th,  
4 2020, did Metro have a pool of applicants that was  
5 qualified from which Metro could have hired the  
6 executive directors for the 2020/2021 -- and for the  
7 record, I'm saying 2020 slash 2021.

8 **A. Gotcha.**

9 Q. So prior to June 4th when Chad High was  
10 interviewed, was there a qualified pool of applicants  
11 for those positions in your opinion?

12 **A. I mean, I've not -- I wasn't privy to a pool of**  
13 **applicants per se by HR -- that's an HR question --**  
14 **because I never got a list of a qualified pool of**  
15 **applicants that was on like a list or something when**  
16 **you say "pool."**

17 Q. So that's not what -- I'm asking something  
18 that's a little different.

19 I'm asking in your opinion as one of the  
20 individuals who sat on the interview panel prior to  
21 June 4th, 2020, in your opinion, was there a qualified  
22 pool of applicants from which Metro could have chosen  
23 the executive directors for the 2020/2021 school year?

24 **A. Okay, in my opinion as an experienced school**  
25 **leader, applicants are chosen to support schools based**

1 **on the needs of the schools. So I can't tell you if**  
2 **there is a qualified need if you were looking for**  
3 **someone to support a school of which a candidate**  
4 **didn't exhibit any of those qualities.**

5 **So for me, I'm looking for a specific candidate**  
6 **with qualities to address the needs at hand, because**  
7 **I've got to have somebody that's going to be able to**  
8 **support what the challenges are.**

9 **So in my experience, I can only answer you based**  
10 **on I'm looking for somebody that aligns with the need**  
11 **of a particular school where I need support. So I**  
12 **don't know what schools -- that's why I was allowed to**  
13 **be able to select candidates that fit the needs of**  
14 **what my three tiers needed.**

15 Q. You weren't just interviewing -- you were  
16 interviewing for all of the -- you were on the  
17 interview panel for all the executive director  
18 positions. Right?

19 **A. Correct.**

20 Q. I just want to make sure that I understand. Are  
21 you saying that you were not qualified to determine  
22 whether or not someone was qualified for the other  
23 executive director positions?

24 **A. I was overqualified to say that, but I was**  
25 **sitting to look at everyone to be sure that our**

1 **neediest and most vulnerable schools, that I got a**  
2 **selection to look at all of the viable candidates**  
3 **before selecting someone to lead the schools.**

4 **So when I say viable for the schools, I don't**  
5 **know all 180 plus schools that Metro Nashville has.**  
6 **So the need for the schools was being considered as**  
7 **executive directors was selected. And that's the way**  
8 **I selected mine.**

9 **So by me not having interaction with all 180**  
10 **schools, I'm not able to share with you what the needs**  
11 **were for those specific schools and did the candidates**  
12 **have the skill set to make an impact at those schools,**  
13 **because in my experience -- you asked for my**  
14 **opinion -- that's how I select leaders and I select**  
15 **people to support schools based on the needs of the**  
16 **schools and the skill set of the candidate.**

17 Q. So you were not aware of what the needs were for  
18 the executive director positions for nonpriority  
19 schools. Correct?

20 **A. I know the basic needs of what schools need in**  
21 **the executive directors' roles. I was an executive**  
22 **director. So I'm very familiar with the role.**

23 **However, in the selection process of who went**  
24 **where, I was only at Metro Nashville Public Schools**  
25 **for a year. I was able to read and understand and**

1 **visit schools to know what was happening in my own**  
2 **schools.**

3 **However, I did not select -- when you say do I**  
4 **have qualified candidates or pools, there were people**  
5 **who worked with schools who knew more about their**  
6 **needs than I did being on the ground for a year and**  
7 **only working with a subset of schools.**

8 **So I am more than overqualified to be able to**  
9 **determine who is a viable candidate, but first talking**  
10 **about the needs of a school is where the challenge**  
11 **comes in.**

12 Q. Okay. So prior to June 4th, 2020, was there a  
13 pool of viable candidates, to use your word, for the  
14 executive director positions for the 2020/2021 school  
15 year based on your professional opinion and  
16 experience?

17 **A. I would not know if there was a viable**  
18 **candidate. That was not shared with me if there was a**  
19 **pool of viable candidates, because I wasn't looking**  
20 **for -- I mean, for any additional candidates outside**  
21 **of what my recommendations was. So to answer your**  
22 **question, I don't know if there was a pool.**

23 Q. Help me understand this, Dr. Griffin. You were  
24 on the interview panel.

25 **A. I was.**

<p style="text-align: right;">Page 177</p> <p>1 Q. But you don't know whether the individuals you 2 interviewed had the basic qualifications --</p> <p>3 <b>A. Oh, you said basic. They had the basic -- yes,</b> 4 <b>every person, I'm sure, based on the résumé that was</b> 5 <b>selected -- you know, there is a process when you look</b> 6 <b>at candidates. You first look at this is who we are</b> 7 <b>looking at, do they fit the need on paper? That's the</b> 8 <b>first look. Do they fit the need on paper?</b></p> <p>9 Then in an interview, did they answer the 10 questions, whatever, whatever we were going to use. 11 Based on the questions, does their experience align? 12 Now, what's the need of the school? Does this 13 person's quality skill set/experience align up with 14 what you need for this particular school?</p> <p>15 So it could have been a school with a high ESL 16 population, needed someone who had some experience 17 working with ESL students. I was looking for people 18 who had experience with working with students in a 19 nontraditional setting.</p> <p>20 So when you say "basic," yes, basic qualities 21 got people interviews. I'm sure we didn't have 22 anybody that didn't fit the basic -- when you say 23 "basic qualities," this interview process was 24 strenuous.</p> <p>25 We did it all online. It was right when the</p>	<p style="text-align: right;">Page 179</p> <p>1 offer after-school programs and closing those gaps, 2 you can't just say, I have a whole bunch of shoes that 3 is a Size 9 and I wear a Size 7. So that is not what 4 this is.</p> <p>5 You have to get what fits the need. If I wear a 6 7, I need a 7. A whole bunch of 10s, 9s, won't help 7 me. So it's the same thing with school leadership and 8 principals. A whole bunch of people don't fit the 9 need at hand. We're trying to close gap, change lives 10 for kids.</p> <p>11 I can't just pull a person because I interviewed 12 25 if the need calls for something else. So I can't 13 legally and ethically tell you that there was a pool 14 of viable candidates when the need may have called for 15 something different.</p> <p>16 Q. Okay. But were you not on the panel?</p> <p>17 <b>A. The panel for who?</b></p> <p>18 Q. Yes or no.</p> <p>19 <b>A. For who?</b></p> <p>20 Q. For the executive director.</p> <p>21 <b>A. Oh, I was on the panel. You went out. So I</b> 22 <b>couldn't hear you. I was on the panel for the</b> 23 <b>executive director.</b></p> <p>24 Q. That was -- we're getting long in the day. So 25 let's just focus on the question that's being asked.</p>
<p style="text-align: right;">Page 178</p> <p>1 pandemic started. So I'm sure we did not waste any 2 time interviewing anybody who remotely would not have 3 been considered a viable candidate. I can say that.</p> <p>4 Q. So, Dr. Griffin, prior to June 4th, 2020, what 5 was your impression of -- your overall impression of 6 the pool of candidates that you interviewed for 7 executive director? So I'm not talking about every 8 single person that applied. I'm talking about the 9 individuals that you participated in the interview 10 pool, what was your overall impression of those 11 candidates prior to June 4th, 2020?</p> <p>12 <b>A. My overall impression was the -- based on if</b> 13 <b>they were going to elementary, middle, or high. So I</b> 14 <b>mean, I think that's a question that you have to be</b> 15 <b>more specific around, because these principals, or</b> 16 <b>these executive directors, former principals, would</b> 17 <b>have been supporting tiers of schools, elementary,</b> 18 <b>middle, and high. So that's a loaded question that</b> 19 <b>can't be answered with a, hey, they were all great,</b> 20 <b>no.</b></p> <p>21 If my need is that I need someone with an 22 experience working with students who have experienced 23 trauma, students who are not reading on grade level, 24 students who may not have a lot of support as it 25 relates to parental support, how are you going to</p>	<p style="text-align: right;">Page 180</p> <p>1 To the best of your knowledge, were there 2 different questions that were asked to different 3 applicants based on whether that applicant was maybe 4 going to be considered to be slotted into an 5 elementary, middle, or high school?</p> <p>6 <b>A. No. The questions -- and, again, when many of</b> 7 <b>the executive directors had the opportunity to talk</b> 8 <b>about potentially what the résumé may not have shown,</b> 9 <b>their experience per se, some of them, as I remember,</b> 10 <b>alluded to the fact of, Hey, my experience has been in</b> 11 <b>elementary. I love elementary. Hey, but I would be</b> 12 <b>willing to do middle slash high or whatever the need</b> 13 <b>was.</b></p> <p>14 So some candidates even shared with us their 15 desire or expertise. So questions weren't per se 16 different, but candidates did have the opportunity to 17 talk about their skill set and where they thought 18 would be the best fit.</p> <p>19 Q. All the candidates were asked the same questions 20 to the best of your recollection?</p> <p>21 <b>A. Uh-huh, the questions were on -- we had to score</b> 22 <b>them. So the questions were based on what was already</b> 23 <b>on a prepopulated sheet, and we submitted send after</b> 24 <b>the interviews.</b></p> <p>25 Q. Okay. So this would be a yes or no answer. All</p>

1 the candidates were asked the -- scored on the same  
 2 questions for the interviews that you sat in on.  
 3 Correct?  
 4 **A. Absolutely, yes.**  
 5 Q. Okay. And I'm going to try this one more time.  
 6 Based on the interviews that you sat in on, was it  
 7 your opinion that prior to June 4th, 2020, Metro  
 8 needed additional candidates because there were not  
 9 candidates -- there were not enough candidates that  
 10 would be good fit for the executive director positions  
 11 for the 2020/2021 school year in your opinion?  
 12 **A. My answer has not changed from our original**  
 13 **conversation. In my opinion and in my experience, you**  
 14 **can't just say you've got a pool of people that don't**  
 15 **fit what the need is, and so if after reviewing the**  
 16 **applicants there was a need to find a fit, I'm going**  
 17 **to say Metro has every right to go and get a fit for**  
 18 **the schools that are needed.**  
 19 **I -- whether they did that or not, that's a**  
 20 **different question, but what I'm saying to you, in my**  
 21 **experience, one thing that has happened in this world**  
 22 **of education is we have to make sure that people have**  
 23 **a skill set. Kids get one shot at this. They get one**  
 24 **shot. So we have to make sure that we have the right**  
 25 **people in front of them every single day. That's part**

1 **of making sure that we're doing our due diligence.**  
 2 **You have to have the right person in front of kids**  
 3 **every day. So my answer is the same as it was five**  
 4 **minutes ago.**  
 5 Q. Okay. So for all those individuals that we just  
 6 walked through whose interviews were scheduled prior  
 7 to June 4th, 2020, you don't know whether they were  
 8 going to be a good candidate for one of the available  
 9 executive director positions. Is that what you're  
 10 saying?  
 11 **A. I don't know if they were going to fit the need.**  
 12 **That's what I'm saying.**  
 13 Q. As one of the members of the interview panel?  
 14 **A. As one of the members of the interview panel, I**  
 15 **don't know that every candidate interview was going to**  
 16 **fit the need for every school, and I can only tell you**  
 17 **in my opinion, because that's what I look for.**  
 18 Q. Okay. In your opinion, did they fit the need?  
 19 **A. Who?**  
 20 Q. All those individuals that we just talked about.  
 21 **A. I selected three executive directors. So I**  
 22 **think that question is I was able to select three**  
 23 **executive directors.**  
 24 Q. Okay. I'm going to show you another document.  
 25 Can you see my screen, Dr. Griffin?

1 **A. I can.**  
 2 Q. Okay. Take a look at this document and let me  
 3 know once you have had a chance to review it, please.  
 4 **A. Okay. I have read that.**  
 5 Q. Okay. Have you seen this document before?  
 6 **A. This document was two years ago, June 3rd. So I**  
 7 **can't say that I have seen it, but my name is on the**  
 8 **email.**  
 9 Q. Okay. And the email address, it's  
 10 sharon.griffin2@mnps.org. Correct?  
 11 **A. I think that's it. I'm retired. So I don't**  
 12 **remember if that was it exactly, but HR can tell you.**  
 13 Q. What I'm asking is on this email, is that the  
 14 email address that's listed?  
 15 **A. Oh, yeah. I didn't see that. I see it now.**  
 16 **Yes.**  
 17 Q. Okay. This is an email from Lisa Spencer to you  
 18 and others on June 3rd, 2020. Correct?  
 19 **A. June 3rd, 2020, 5:03, yes, I see that.**  
 20 Q. Okay. And in the email, she says they are  
 21 adding another interview to the group, Chad High, who  
 22 was the current principal at Granbery. Correct?  
 23 **A. That's what that says. I see that.**  
 24 Q. Do you know why Chad High was added --  
 25 **A. I don't.**

1 Q. -- to the (Zoom malfunction)?  
 2 **A. I don't.**  
 3 Q. You do not know why --  
 4 **A. I do not know why, no.**  
 5 (Exhibit 6 was marked.)  
 6 Q. Did you know that Dr. Barnes did not interview  
 7 Chad High?  
 8 **A. I don't know that, no.**  
 9 Q. Okay. Did you know that several of the  
 10 individuals who participated or who interviewed for  
 11 the executive director role had actually served as  
 12 executive directors in the past?  
 13 **A. I am aware during my one year those who**  
 14 **served -- a few of them who served as an ED, yes.**  
 15 Q. Okay. Would prior experience as an executive  
 16 director inform your opinion about whether that  
 17 individual was qualified to serve as an executive  
 18 director again?  
 19 **A. I think prior experience is one thing. Were**  
 20 **principals successful during that experience is**  
 21 **another.**  
 22 Q. Okay. Do you know that there were several  
 23 individuals who scored very highly on the panel  
 24 interview who were not hired?  
 25 **A. I don't -- again, our send button goes to the HR**

1 department. Scores are not shared with me. I don't  
 2 even know what everybody's score was.  
 3 Q. Okay. Did you ever have any conversations with  
 4 Dr. Battle after your participation in the panel  
 5 interview about the executive directors or the  
 6 interview process for the executive directors and who  
 7 was going to be hired and who was not going to be  
 8 hired?  
 9 A. I did not.  
 10 Q. Did you know that Dr. Battle meets privately  
 11 with school board members?  
 12 A. I'm trying to see. When you say meet  
 13 "privately," you mean individually, meet individually?  
 14 Q. I mean outside of school board meetings.  
 15 A. Yes, that's a regular practice of  
 16 superintendents. You just can't meet with two or more  
 17 because you'll have to have the media there, but as a  
 18 chief in a former district, that's a regular practice.  
 19 Q. It's a regular practice for superintendents in  
 20 other districts to meet privately with school board  
 21 members --  
 22 A. Absolutely, that's their one employee. They  
 23 have one employee. Absolutely, that's a regular  
 24 practice. Two or more and you need the media there.  
 25 So it's quite often that superintendents meet with one

1 board member, because, of course, you will have to  
 2 call the media if you've got two or more.  
 3 Q. What other districts are you aware of where --  
 4 well, let me ask it this way: What other districts  
 5 where you have worked is that a practice in?  
 6 A. I worked with Memphis City Schools. I was with  
 7 Memphis City Schools for 20 -- let's see, they merged  
 8 in 2012. I started out as a biology, physics, and  
 9 chemistry teacher in 1991-92 school year. So in  
 10 2012 -- that would be how many years later? So I did  
 11 it for Memphis City, Shelby County, and, of course,  
 12 I'm now with Metro.  
 13 Q. Or you were.  
 14 A. So this is my third district. Metro was my  
 15 third district.  
 16 Q. Okay. So in Memphis City Schools, the  
 17 superintendent met privately with school board  
 18 members?  
 19 A. And Shelby County, Memphis City and Shelby  
 20 County.  
 21 Q. I'm going to ask one at a time -- about one at a  
 22 time.  
 23 A. Okay.  
 24 Q. So let me ask it again. So in Memphis City  
 25 Schools, the superintendent met privately with school

1 board members?  
 2 A. Yes.  
 3 Q. Do you know if they gave school board members  
 4 presentations during those meetings?  
 5 A. I don't know about presentations, but being  
 6 their one employee, I'm sure there was questions about  
 7 job description, roles, clarity around something, hey,  
 8 let me be clear, because we all know that constituents  
 9 call board members all the time, and if they are well  
 10 informed, then they can talk their constituent up or  
 11 down based on potentially something that is not true  
 12 that unfortunately has snowballed into something  
 13 that's really not as critical and crucial as the  
 14 caller could think.  
 15 So it's important that our board members are  
 16 well informed, and sometimes not being an educator and  
 17 being a board member, it's a challenge. And so I saw  
 18 it beneficial even sometimes when my former districts  
 19 met with board members to help give them clarity  
 20 around what was happening in the educational world  
 21 because if you are not an educator, you can read and  
 22 misinterpret, and, therefore, there could be  
 23 misinformation out there.  
 24 Q. Okay. Do you know if the superintendent at  
 25 Memphis City Schools ever presented the same

1 PowerPoint to each school board member in private  
 2 meetings with individual school board members  
 3 regarding board business and then placed that board  
 4 business on a consent agenda for it to be voted on  
 5 without discussion at the school board meeting?  
 6 A. No, I don't know what happened in those private  
 7 meetings. I wasn't in there. But I am aware that  
 8 they occurred.  
 9 Q. Okay. Same question for Shelby County.  
 10 A. I'm not aware of that happening, because I  
 11 wasn't there.  
 12 Q. Did you ever attend any of Dr. Battle's private  
 13 meetings with school board members?  
 14 A. No.  
 15 Q. Okay. I want to go back and try to dig in just  
 16 a little bit to the priority school issue.  
 17 There is a statute that establishes when a  
 18 school becomes a priority school. Correct?  
 19 A. Uh-huh.  
 20 Q. Okay. And that statute sets out the criteria  
 21 for whether a school is going to be priority or not.  
 22 Correct?  
 23 A. Yes.  
 24 Q. Okay?  
 25 A. That's what it was. I don't know if that's



1 **what's going to continue.**  
 2 Q. Okay. Did anyone -- did anyone at State tell  
 3 you that Whites Creek was going to be taken over?  
 4 Just yes --  
 5 **A. No.**  
 6 Q. I'm going to show you one -- just one other  
 7 document, and then I think I'll be done.  
 8 I'm going to share my screen with you. Dr.  
 9 Griffin, can you see my screen?  
 10 **A. I can.**  
 11 Q. Okay. And this is the 2021 School  
 12 Accountability Report on the Department of Education  
 13 website. Correct?  
 14 **A. I guess it is, yeah. I'm looking at it.**  
 15 Q. Okay. The web address is TN.gov --  
 16 **A. Uh-huh, that's correct.**  
 17 Q. Begins -- (Zoom malfunction) -- .gov. Is that  
 18 correct?  
 19 **A. Yes, that's it.**  
 20 Q. So to the best of your knowledge, this is a  
 21 Tennessee official website. Correct?  
 22 **A. Yes.**  
 23 Q. Okay. And so for 2021, at the bottom of this  
 24 web page, it has designations including priority  
 25 schools. Correct?

1 **A. Uh-huh.**  
 2 Q. Okay. So if I click on priority school, which  
 3 I'm doing now --  
 4 **A. Uh-huh.**  
 5 Q. -- it gives a list of priority schools.  
 6 Correct?  
 7 **A. From what I'm looking at, yes.**  
 8 Q. And does this show that Whites Creek High is on  
 9 that list?  
 10 **A. Yes.**  
 11 Q. For 2021. Correct?  
 12 **A. Uh-huh, yes.**  
 13 Q. And then I'm going to go back and show you the  
 14 same document for 2014. So this is the Tennessee  
 15 Department of Education 2014 School Accountability --  
 16 **A. Uh-huh.**  
 17 Q. -- documentation. Correct?  
 18 **A. Yes.**  
 19 Q. Okay. And then same thing, this has a list of  
 20 designations including priority schools.  
 21 **A. Uh-huh.**  
 22 Q. Correct?  
 23 **A. Yes.**  
 24 Q. Now, this 2015 priority schools, do you know if  
 25 priority schools were designated in 2014?

1 **A. I don't know. I don't see 2014 on there, but --**  
 2 Q. Just based on your knowledge.  
 3 **A. We had data in 2014. I was a regional**  
 4 **superintendent from 2012 to 2017, and we had data. So**  
 5 **I'm not sure why the priority school data is not on**  
 6 **there.**  
 7 Q. Okay. So this says -- and this is just what's  
 8 on the Tennessee Department of Education website for  
 9 2014.  
 10 **A. Right.**  
 11 Q. When you click on this drop-down menu for  
 12 priority schools, underneath that, it says, Approved  
 13 by the Board of Education on August 26, 2014.  
 14 Correct?  
 15 **A. Okay.**  
 16 Q. Do you see that?  
 17 **A. I do.**  
 18 Q. Okay. And then it goes by county. So it begins  
 19 with Davidson County and then goes into all the other  
 20 counties. Do you see that?  
 21 **A. Uh-huh, I do.**  
 22 Q. So this is going to -- I'm going to put the  
 23 screen over the list of Davidson County schools, and  
 24 just take a look at that and let me know when you have  
 25 had a chance to look at the Davidson County schools.

1 **A. I see it. I've looked at it.**  
 2 Q. Is Whites Creek on there?  
 3 **A. I don't see Whites Creek. It looks to be**  
 4 **alphabetized. I don't see Whites Creek.**  
 5 Q. Let's look at this same document for 2015. So  
 6 this is the 2015 School Accountability List from the  
 7 Tennessee Department of Education website.  
 8 **A. Uh-huh.**  
 9 Q. Again, scrolling to the bottom, there's a  
 10 drop-down menu for priority schools, and I'm going to  
 11 click on that. And same thing, it goes by county. So  
 12 I'm going to hover over the Davidson County list, and  
 13 just let me know when you have had a chance to look at  
 14 that.  
 15 **A. Uh-huh, I see it.**  
 16 Q. Okay. Is Whites Creek on there?  
 17 **A. I don't see Whites Creek.**  
 18 Q. Okay. When we were looking earlier at the 2017  
 19 data, there was no priority school list for 2017 on  
 20 the State's website. Correct?  
 21 **A. Okay. I don't know. I mean, you'll have to go**  
 22 **back to it. I can't -- I mean, I don't have my own**  
 23 **data in front of me and ...**  
 24 Q. Well, this is the State's data. Correct?  
 25 **A. Right.**

1 Q. And we were looking at this earlier, the 2017  
2 school accountability data. Do you remember that?  
3 **A. I do.**  
4 Q. Okay. And when we scroll to the bottom, there  
5 is no priority school list on the State's website.  
6 Correct?  
7 **A. Right, and I'm not sure why.**  
8 Q. Do you know why that --  
9 **A. At this -- I don't know. Do you know?**  
10 Q. No, I'm generally asking if you know why there  
11 is no list.  
12 **A. No.**  
13 Q. Okay. Okay.  
14 **A. Can I ask you a question, and can I ask a**  
15 **question based on what you just asked for clarity?**  
16 Q. Yeah.  
17 **A. What does your record show where Dr. James**  
18 **Bailey was the principal at Whites Creek and for how**  
19 **long since we're looking at priority school data? How**  
20 **long was he the principal?**  
21 Q. I'll let Ms. Steiner decide if she wants to ask  
22 you about that.  
23 **A. Okay, because I have a comment.**  
24 Q. Okay. Those were all the questions I've got.  
25 Thank you.

1 **A. Thank you.**  
2 MS. HARBISON: And actually, can we take a  
3 five-minute break?  
4 MS. STEINER: Yes.  
5 Dr. Griffin, I've just got one or two, and  
6 that's it. I promise.  
7 **THE WITNESS: Okay.**  
8 (Short break.)  
9 MS. HARBISON: I actually have a few more  
10 questions. We can go back on the record.  
11 BY MS. HARBISON:  
12 Q. Are you ready, Dr. Griffin?  
13 **A. Yes, yes.**  
14 Q. Okay. What is the difference between Dr. Conley  
15 and Dr. Bailey? Why was Dr. Conley promoted and  
16 Dr. Bailey was removed from his position?  
17 **A. I can't answer that, because I did not promote**  
18 **Dr. Conley. I can tell you that the recommendation**  
19 **was made based on the data and my experience, which is**  
20 **why the recommendation and an intervention -- which an**  
21 **intervention does include replacing school leadership**  
22 **as what we can share with a state when we write grants**  
23 **so that they will not try any other type of**  
24 **intervention.**  
25 **So I don't know why we are talking about**

1 **Dr. Conley or what this has to do with it, but the**  
2 **data that I observed, I looked at -- again, I asked**  
3 **you how long Dr. Bailey had been there, because even**  
4 **if a school was on the list the finite period of time**  
5 **that you are trying to document, if the principal was**  
6 **there putting in place strategies and a school went**  
7 **into priority status, the State still looks at the**  
8 **principal who has been there for three or more years**  
9 **and the State moved into priority status.**  
10 **So I don't know about Dr. Conley, don't even**  
11 **know why the question -- I mean, maybe it's something**  
12 **that you all need to tell me. I don't know why the**  
13 **question about Dr. Conley is coming up, but --**  
14 Q. Well, let me say this is our chance to ask you  
15 questions about things that you may know. Okay?  
16 **A. Oh, okay.**  
17 Q. So regardless of whether you don't know why  
18 we're asking it, we're still allowed to ask it. Okay?  
19 **A. Okay.**  
20 Q. So with that being said, just to make sure I  
21 understand your question, you don't know the  
22 difference between the two of them, why Dr. Conley was  
23 promoted and why Dr. Bailey was removed, even though  
24 they were both on priority level?  
25 **A. I know the recommendation I made for -- the**

1 **recommendation that I communicated and have several**  
2 **times in this deposition is that the data that Whites**  
3 **Creek had, being the lowest-ranked school in the**  
4 **district as well as having data for the last three**  
5 **years that was not favorable, clearly made them a**  
6 **candidate for State takeover. That's what was**  
7 **communicated about the intervention needing to happen**  
8 **immediately.**  
9 Q. The criteria for whether the State is allowed to  
10 take over is set forth in the statute. Correct?  
11 **A. Well, it could be because there have been times,**  
12 **Memphis -- when I was with Memphis, Memphis lost, the**  
13 **ASD had 30 schools, 30 schools.**  
14 **In 2012, when over 1800 schools in the state at**  
15 **that time when the data for three years -- remember**  
16 **now, you are talking about priority schools, but data**  
17 **is run every three years. So it's very clear that a**  
18 **school could be on the list in '15 and appear on the**  
19 **list in '18, because the data from three years is**  
20 **showing that that school was on a steady decline.**  
21 **In 2012 when the original list was run of**  
22 **schools to even be on a list, there were 85 schools.**  
23 **Sixty-nine was in Memphis. The State came and took 30**  
24 **schools from Memphis. Thirty schools was taken.**  
25 **At that time, I was hired to lead the Innovation**

1 Zone of which not another school was taken, and even  
2 the schools that we had, we said, No, State, let us  
3 run our own schools. Let us have what's called the  
4 iZone and create our own.

5 Our schools made double-digit gains,  
6 outperformed the State, which is why I'm saying we  
7 don't want schools going to the State. The State  
8 didn't even do what they were supposed to do with the  
9 30 they got, the two that they got out of Nashville.  
10 They got two schools from Nashville, but they took 30  
11 from Memphis.

12 So when I talk about schools being taken, it's  
13 very real. It can happen. It happened. I saw it  
14 happen. I lived it, and I did not want it to happen  
15 to Metro Nashville Public Schools.

16 So I'm just telling you now, when you talk  
17 about -- with Dr. Conley or whatever else had  
18 happened, I don't know, but I'm telling you the  
19 recommendation for an intervention and replacing the  
20 principal is an intervention to keep the State out of  
21 your backyard.

22 Q. The State gets its authority to take schools  
23 over from the statute, correct, from statutory  
24 authority. Correct?

25 A. Well, there is a statute that talks about

1 priority schools. You'll have to -- I'll have to  
2 yield to the attorney on what the statute exactly  
3 does, but I'm telling you how the statute worked and  
4 what I was a part of the work. And it was three years  
5 of data. If the principal had been there -- actually,  
6 I mean if you go and read all of the information  
7 around on the iZone -- I can't even ever remember  
8 keeping a principal in my experience as a leader for  
9 six years. I didn't even keep a principal -- if the  
10 State took over one year or was talking about taking  
11 over one year looking at if the principal had been  
12 there two or more years, I didn't keep them.

13 So that is regular practice in turnaround work.  
14 This is not something that I just made up. I don't  
15 know -- I didn't know anything about the historical  
16 context that you provided that happened. I'm looking  
17 strictly at the data and doing my job.

18 Q. Why was Celia Conley's school not at risk of  
19 being taken over by the State?

20 A. Because there is not only just being on the list  
21 three years. There is not only just being at the  
22 school three or more years. It also is a ranking  
23 process.

24 As a high school that -- and no other high  
25 school in Metro Nashville Public Schools from my

1 understanding had ever been taken over. Whites  
2 Creek's rich narrative, it was a flagship school in  
3 the community, it was prime target for the State to  
4 take based on the ranking. Whites Creek was also  
5 ranked last out of 188 schools based on data in the  
6 whole district, the entire district. You can get that  
7 information from REA, Research & Assessment.

8 Q. Is that a State agency?

9 A. No, that's a Metro agency. They rank all the  
10 schools.

11 Q. Okay. And that's not an outside agency; it is a  
12 department within Metro?

13 A. It's a department within Metro that provides the  
14 data, breaks it down. That's all they do is data. I  
15 mean, that's a big chunk of their work, data.

16 Q. Where was Antioch Middle ranked?

17 A. I don't know. I'm retired, and I don't have  
18 that data in front of me. Had I not been, I would  
19 have all of that. So you would have to get the  
20 ranking from them. I know about Whites Creek because  
21 I used it in the narrative to explain the rationale.

22 Take the person out of it. I'm talking about data and  
23 numbers.

24 Q. Who was ranked second to last?

25 A. I can't remember that either.

1 Q. Was that individual removed from their school?

2 A. I'm not sure if that individual was removed. My  
3 recommendation was to ensure that we keep a school  
4 within Metro Nashville Public Schools. So I don't  
5 know if that individual was removed, because I can't  
6 even remember who the second school was.

7 Q. Okay. Do you recall that the 2017 TNReady  
8 scores were not to be used for -- to identify a school  
9 as a priority school or assign them to the achievement  
10 school district? Do you recall that?

11 A. I don't recall. I would have to look at some  
12 notes that I have. I don't recall.

13 Q. Let me share my screen. Can you see my screen,  
14 Dr. Griffin?

15 A. I can.

16 Q. Okay. This is Tennessee Code Annotated  
17 49-1-602. Correct?

18 A. I see that on the screen.

19 Q. Okay. I understand that you are not a lawyer,  
20 but in your capacity as someone that has worked with  
21 priority schools in the past, are you -- did you have  
22 an occasion to become familiar with this statute?

23 A. Uh-huh, yes.

24 Q. Okay. Is this the statute that sets forth the  
25 criteria for whether a school is a priority school or

1 not?

2 **A. I cannot answer that question without**

3 **confirmation from a lawyer.**

4 Q. Okay. I'm going to scroll down and show you A4.

5 **A. Uh-huh.**

6 Q. And I'll highlight it for you so you can see.

7 **A. Okay.**

8 Q. Can you read that for me and let me know when

9 you have had a chance to read it?

10 **A. Okay, I see that.**

11 Q. Does that help refresh your recollection about

12 what a TNReady assessment would be used for the

13 2017-2018 school year?

14 **A. I do see that.**

15 Q. So based on that refreshed recollection, do you

16 recall whether or not the TNReady scores for 2017-2018

17 could be used to identify a priority school?

18 **A. According to this, it says they shall not be**

19 **used to identify a school as a priority school or to**

20 **assign a school to the achievement school district.**

21 Q. Okay. And then going down to Subsection B --

22 **A. Okay.**

23 Q. -- is this what defines -- and specifically

24 Subsection 2 here that I have my mouse over -- is this

25 the part of the statute that defines when a school is

1 a priority school for the purposes of state law?

2 **A. Uh-huh, based on what I'm reading.**

3 MS. HARBISON: Okay. I'm going to make this

4 the next numbered exhibit, please.

5 Those are all my questions. Thank you,

6 Dr. Griffin.

7 **THE WITNESS: Thank you.**

8 (Exhibit 7 was marked.)

9 MS. HARBISON: Ms. Steiner may have one.

10 **FURTHER EXAMINATION**

11 BY MS. STEINER:

12 Q. Dr. Griffin?

13 **A. Yes, ma'am.**

14 Q. Did anyone from the State contact you to say

15 they were planning on taking over Whites Creek?

16 **A. No, ma'am, and in my experience, they have never**

17 **contacted us to say they are taking over, the State.**

18 **They just show up yesterday to say they are taking**

19 **them tomorrow.**

20 Q. Now, when you scored for the interviews with

21 executive officer of director -- of equity and

22 inclusion and diversity -- executive officer of

23 diversity, equity and inclusion, I believe you

24 testified that you did not pick who got that job.

25 Correct?

1 **A. I did not.**

2 Q. Okay. Did Dr. Battle pick who was chosen for

3 that position?

4 **A. I'm not sure who picked that. Our role when you**

5 **serve on the interview panel is to submit the**

6 **responses from the interview.**

7 Q. Okay. And you served on the interview panel

8 along with Hank Clay. Correct?

9 **A. I did.**

10 MS. STEINER: Okay. That's all.

11 AND FURTHER DEPONENT SAITH NOT.

12 (Signature is waived.)

13 (Deposition concluded at 2:47 p.m.)

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1 **REPORTER'S CERTIFICATE**

2 **STATE OF TENNESSEE:**

3 **COUNTY OF SHELBY:**

4 I, ANNE COSSAR PERRY, LCR #283, do hereby

5 certify that the above transcript of proceedings was

6 reported by me and that the foregoing transcript, was

7 stenographically reported by me and constitutes a true

8 and correct transcript of said proceedings to the best

9 of my knowledge, skills, and ability.

10 I FURTHER CERTIFY that I am not related to any of

11 the parties named herein, nor their counsel, and have

12 no interest in the outcome or events of this action.

13 I FURTHER CERTIFY that I am duly licensed by the

14 Tennessee Board of Court Reporting as a Licensed Court

15 Reporter as evidenced by the LCR number and expiration

16 date following my name below.

17 I FURTHER CERTIFY that reading and signing of the

18 transcript was not requested and I reported the


19 deposition to the best of my ability via Zoom.

20 WITNESS MY SIGNATURE, this, the 5th day of

21 June, 2022.

22

23

24   
ANNE COSSAR PERRY.  
LCR NO. 283  
Commission Expires June 30, 2024

25



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**Exhibits**

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**Ex 02 - Sharon Griffin**  
4:12 93:24,25 94:1

**Ex 03 - Sharon Griffin**  
4:13 93:23 108:13,16

**Ex 04 - Sharon Griffin**  
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**Ex 05 - Sharon Griffin**  
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**Ex 06 - Sharon Griffin**  
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**Ex 07 - Sharon Griffin**  
4:17 202:8

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**--I** 149:13

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